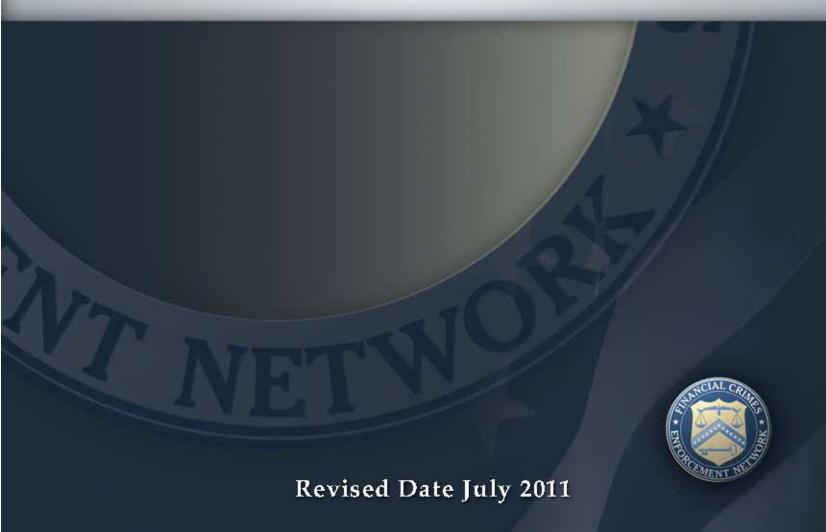# BSA Electronic Filing Requirements For

Suspicious Activity Reports
by Money Services Business (SAR-MSB)
(FinCEN Form 109)

Revised Date July 2011

DEPARTMENT OF THE TREASURY

These Requirements for Electronic Filing of Suspicious Activity Reports by Money Services Business (SAR-MSB) (FinCEN Form 109) were developed under the sponsorship of the following:

Financial Crimes Enforcement Network

Internal Revenue Service

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

ii

Table of Contents

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

iii

Revision History

Version Number	Date	Reason for Change
1.0	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.
		Adds a link to FinCEN's Preparation Guidelines for Use of Special Response "XX" in FinCEN Form 109.
		Specifies that in the Suspicious Activity (3A) Record, the Number of Subjects and Number of Explanation/Description Records fields should be right justified and zero filled. Note that any electronic or magnetic media filer currently filing SAR MSBs successfully with Enterprise Computing Center – Martinsburg (ECC-M) will already have this field correctly formatted.
		Corrects the document to indicate that the 5A, 5B, 6A and 6B records are not required records.
		Clarifies that the 2C Record, Field Position 8, is in reference to multiple transaction locations.
1.1	8/28/09	Adds SAR-MSB 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.
		3A Record, Field Position 104-113, Character of Suspicious Activity, has been clarified to state "Enter all the numbers that apply, left justified and space filled with no spaces between multiple numbers."

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

iv

Version Number	Date	Reason for Change
		For Record 4A Field Position 14, Subject's Type, an entry is required. Multiple 5A, 5B, 6A and 6B records are allowed. For Records 5A, 5B and 6A, clarification has been added in the introductory paragraph regarding aggregation of transactions involving the same issuer.
1.2	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 164-188, Reporting Business City (Item 38) remarks revised to add "Do not abbreviate or use punctuation." Record 2B Field Position 120-169, Transaction Location Permanent Address (Item 26); and Field Position 170-194, Transaction Location City (Item 27) remarks revised to add "Do not abbreviate or use punctuation." Record 4A Field Position 70-119, Subject's Address and Field Position 120-144, Subject's City revised to add "Do not abbreviate or use punctuation." Record 4A Field Position 221-222, Subject's Issuing State/Country (Item 12f) revised to add "If the issuer is not a state or country on this list, enter "XX" in this field." Record 6B Field Position 13 Bulk Small Indicator1 (Item 21) and Field Position 73, Bulk Small Indicator2 (Item 21) revised to read "Enter an "X" if bulk small currency was involved in the transaction(s)." Adds information about obtaining the xml schema for the acknowledgement file. Attachment B, Error Code List, has been updated. Attachment C, Field Editing Instructions, added.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

v

Version Number	Date	Reason for Change
1.5	01/14/10	Clarification added for 99 maximum number of 4A, 7A records for each 3A record.
1.6	4/9/10	Record 2A introductory paragraph revised: "**If the reporting business is the same as the Transaction Location (2B) Record that immediately follows this record, only the FIRST TWO (2) FIELDS should be completed**. For Record 2A, "Cannot be XX." was added to the following field positions: • Field Position 4-58, Reporting Business Name (Item 35) • Field Position 114-163, Reporting Business Address (Item 37) • Field Position 164-188, Reporting Business City (Item 38) Record 2A, Field Position 191-199, Reporting Business ZIP Code (Item 40) clarified: "If 5 or 9 digits, entry cannot be all zeros or all nines. If 9 digits, the last 4 cannot be all zeros." Record 2A, Field Position 200-201, Reporting Business Country (Item 43) can be blank if country is US. Record 2A, Field Position 221-242, Internal File/Report Number (Item 44), clarified: "If item 34 is "X" leave this field blank." Record 2B, Field Position 197-295, Transaction Location ZIP Code (Item 29) clarified: "If 5 or 9 digits, entry cannot be all zeros or all nines. If 9 digits, the last 4 cannot be all zeros." Record 2B, Field Position 208-216, Transaction Location EIN or SSN/ITIN (Individual) (Item 30) specifies that "123456789" is an invalid entry. Record 2C, Field Position 197-205, Transaction Location ZIP Code (Item 29), clarified: "If 5 or 9 digits, entry cannot be all zeros or all nines. If 9 digits, the last 4 cannot be all zeros."

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

vi

Version Number	Date	Reason for Change
		Record 2C, Field Position 206-207, Transaction Location Country Code (Item 32) can be blank if country is US.
		Record 2C, Field Position 208-216, Transaction Location EIN (Item 30) specifies that "123456789" is an invalid entry.
		Record 3A, Field Position 13-20, From Violation Date (Item 16) and Field Position 21-28, To Violation Date (Item 16) entries cannot be greater than the date in Field Positions 179-186, Date Filed (Item 47).
		Record 3A, Field Position 169-178, Contact Telephone Number (Item 46) clarified: "Can be "XX" if the Reporting Business Country (Item 43) on the 2A record field position 200-201 is not blank (U.S.) or the Transaction Location Country (Item 32) on the 2B record field position206-207 is not blank (U.S.) when the Reporting Business same as Transaction Location Indicator (Item 34) on the 2A record is "X"."
		Record 4A, Field Position 156-157, Subject's Country (Item 11) can be blank if country is US.
		Record 4A, field Position 147-155, Subject's ZIP Code (Item 10) clarified: "If 5 or 9 digits, entry cannot be all zeros or all nines. If 9 digits, the last 4 cannot be all zeros."
		Record 4A, Field Position 159-198, Subject's ID Other Description (Item 12z) clarified: "REQUIRED. If Subject's Identification (Item 12) is "Z" - Other, then enter the description of identification in this field. Subject's Identification (Item 12) must be "Z" - Other if a description of identification is provided in this field."
		Record 4A, Field Position 223-231, Subject's SSN/ITIN/EIN (Item 13) specifies that "123456789" is an invalid entry.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

vii

Version Number	Date	Reason for Change
		Record 5A introductory paragraph clarified: "The 5A record item numbers refer to the money order fields in item 20 in the SAR-MSB Form Part II."
		Record 5B introductory paragraph clarified: "The 5B record item numbers refer to the traveler's check fields in item 20 in the SAR-MSB Form Part II."
		Record 6A introductory paragraph clarified: "The 6A record item numbers refer to the money transfer fields in item 20 in the SAR-MSB Form Part II." Record 6A remarks: "transfer" changed to "money transfer".
		Record 6B introductory paragraph clarified: "The 6B record item numbers refer to the currency exchange fields in item 21 in the SAR-MSB Form Part II."
		Record 7A introductory paragraph clarified: "The 7A Record refers to the SAR-MSB Form Part VI."
		Record 9A introductory paragraph clarified: There should be a 9A record for each Transaction Location Information (2B) Record in the file. The 9A record will immediately follow the last Narrative (7A) Record associated with the 2B record. The 9A record contains the counts of the number of each type of record associated with the 2B record transaction location.
		Record 9B introductory paragraph clarified: "There should be a 9B record in the file for each Parent Reporting Business Headquarters (2A) Record in the file. The 9B record will follow the last Transaction Location Summary (9A) Record associated with the 2A record. The 9B record contains counts of the number of each type of record associated with the 2A reporting business. "
		In Attachment A – Definitions, the definition for the term "Instrument" was clarified: "As used in this form includes currency, money orders, and traveler's checks."

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

viii

Version Number	Date	Reason for Change
		Error Codes F35 and F36 added to Attachment B - Error Code List. Attachment C – Field Editing Instructions, "THE" removed from list of prohibited words in item C.
1.7	6/28/10	Record 1A, field positions 135-143, Transmitter ZIP Code, remarks clarified to disallow a ZIP code of all zeros or nines, and a 9 digit ZIP code ending in 4 zeros or nines. Record 2A, field positions 191-199, Reporting Business ZIP Code (Item 40), remarks clarified for foreign postal codes, and to disallow a 9 digit ZIP code ending in 4 zeros or nines. Record 2B, field positions 197-205, Transaction Location ZIP Code (Item 29), remarks clarified for foreign postal codes, and to disallow a 9 digit ZIP code ending in 4 zeros or nines. Record 2C, field positions 197-205, Transaction Location ZIP Code (Item 29), remarks clarified for foreign postal codes, and to disallow a 9 digit ZIP code ending in 4 zeros or nines. Record 3A, Number of Explanation/Description Records field name renamed to Number of Narrative Records. Field remarks updated with the same name change. Record 4A, field positions 147-255, Subject's ZIP Code (Item 10), remarks clarified for foreign postal codes, and to disallow a 9 digit ZIP code ending in 4 zeros or nines. Error Code M59 description updated to rename "Explanation/Description of the suspicious activity" to "Narrative".
1.8	6/17/11	Error Codes F24 and F37 added to Attachment B – Error Code List.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

ix

Purpose

The purpose of this document is to provide the requirements and conditions for electronically filing Suspicious Activity Report by Money Services Business (SAR-MSB), FinCEN Form 109. 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. For additional guidance, refer to "FinCEN's Preparation Guidelines for Use of Special Response "XX" in FinCEN Form 109, Suspicious Activity Report by Money Services Business (Form Date March 31, 2007" available at http://www.fincen.gov/statutes_regs/guidance/pdf/fin-2008-g006.pdf.

Electronic Filing

The BSA E-Filing System Batch File Testing Procedures are detailed in a separate document that can be accessed on the BSA E-Filing System web site at http://bsaefiling.fincen.treas.gov under Quick Links.

For purposes of these requirements, the filer is the organization responsible for filing the SAR-MSB and the transmitter is the organization responsible for preparing the electronic files.   The filer and transmitter may be the same or different organizations.

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

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

1

File Organization

The following data controls must be followed or the SAR-MSB 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 Reporting Business Headquarters (2A) Record - Required

There can be more than one of this record type depending on the number of different financial institutions which are included on the file. This record type will immediately precede all records which relate to the financial institution. **Include this record with only the first two fields completed if it is the same as the Transaction Location Information (2B) Record that immediately follows this record in the file.**

Transaction Location Information (2B) Record - Required

There can be more than one of this record type depending on the number of transaction locations which are being reported. One of these records will immediately precede all SAR-MSB records for the transaction location.

Transaction Location Information (2C) Record – Multiple Selling and/or Paying Business Locations

This is for multiple locations being reported for the same SAR-MSB. There can be more than one of this record type depending on the number of transaction locations which are being reported.

Suspicious Activity Report (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 by a financial institution.

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 Report (3A) Record.

Money Orders Information (5A) Record

Multiple 5A records are allowed.

Traveler's Checks Information (5B) Record

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

2

Multiple 5B records are allowed.

Money Transfers Information (6A) Record

Multiple 6A records are allowed.

Currency Exchange Information (6B) Record

Multiple 6B records are allowed.

Narrative (7A) Record - Required

There can be multiple occurrences of this record, 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 Report (3A) Record.

Transaction Location Summary (9A) Record - Required

There must be one of these records for each Transaction Location Information (2B) record of a reporting business being reported. It is to be the last record associated with the 2B record.

Parent Money Services Business Summary (9B) Record - Required

There must be one of these records for each reporting business being reported. It is to be the last record associated with the reporting business and will follow the Transaction Location Summary (9A) Record for the last transaction location 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

3

Record Layouts

Transmitter (1A) Record - Required

The first record on each file is to be the transmitter record. It 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. <u>Please note</u>: These records are not found on the paper version of the SAR-MSB form.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "1A".
3-57	Transmitter Name	55	REQUIRED. Enter the name of the individual or organization transmitting the transactions on this file. Individual names should be entered in lastname firstname middleinitial format (e.g. DOE JOHN J).
58-107	Transmitter Address	50	REQUIRED. Enter the street address of the Transmitter.
108-132	Transmitter City	25	REQUIRED. Enter the city of the transmitter.
133-134	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.
135-143	Transmitter ZIP Code	9	REQUIRED. Enter the transmitter ZIP Code. (ZIP +4 if known). Space fill as required. 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.
144-153	Transmitter Telephone Number	10	REQUIRED. Enter the entire phone number of the transmitter, including the area code.
154-208	Transmitter Contact Name	55	REQUIRED. Enter the name of an official contact for the transmitter.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

4

Field Position	Field Name	Length	Description and Remarks
209-217	Transmitter EIN	9	REQUIRED. Must be the valid 9-digit number assigned to the transmitter by the IRS. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789".
218-225	Coverage Beginning Date	8	REQUIRED. This will be the earliest date from the "From Violation Date (Item 16)" fields in the Suspicious Activity Report (3A) Records in the file. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
226-233	Coverage Ending Date	8	REQUIRED. This will be the most-recent date from the "From Violation Date (Item 16)" or the "To Violation Date (Item 16)" fields in the Suspicious Activity Report (3A) Records in the file. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
234-241	Transmitter Control Code (TCC)	8	REQUIRED. Enter your assigned 8-character TCC.
242-245	New Format Indicator	4	REQUIRED. Enter "0051" to indicate FinCEN Form 109.
246-470	Filler	225	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

5

Parent Reporting Business Headquarters (2A) Record - Required

This record identifies information regarding the reporting business headquarters. **If the reporting business is the same as the Transaction Location (2B) Record that immediately follows the 2A record, only the FIRST TWO (2) FIELDS of the 2A record should be completed**. **No other entries are required.** The number of business headquarters (parent) records will depend on the number of different reporting business headquarters which are included on the file. The 2A record item numbers refer to the SAR-MSB Form Part IV.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2A".
3	Reporting Business same as Transaction Location Indicator (Item 34)	1	Enter an "X" if this is true and leave items 35 through 44 blank.
4-58	Reporting Business Name (Item 35)	55	REQUIRED unless item 34 has an "X" entry. Enter the reporting businesses full legal name. Cannot be "XX".
59-113	Reporting Business Doing Business As Name (Item 36)	55	Enter the doing business as name.
114-163	Reporting Business Address (Item 37)	50	REQUIRED unless item 34 has an "X" entry. Enter the entire address of the reporting business, including number, address, and suite number. Do not abbreviate or use punctuation. Cannot be "XX".
164-188	Reporting Business City (Item 38)	25	REQUIRED unless item 34 has an "X" entry. Enter the city where the reporting business is located. Do not abbreviate or use punctuation. Cannot be "XX".
189-190	Reporting Business State (Item 39)	2	REQUIRED unless item 34 has an "X" entry. Enter the two (2) character state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

Field Position	Field Name	Length	Description and Remarks
191-199	Reporting Business ZIP Code (Item 40)	9	REQUIRED unless item 34 has an "X" entry. Enter the ZIP Code for the reporting business. 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. (ZIP+4 if known. Space fill as required. When entering a foreign postal code, left justify and space fill.)
200-201	Reporting Business Country (Item 43)	2	Enter the reporting business country, if other than US. Use the valid country and state standard abbreviations from http://www.fincen.gov/forms/files/country_and_state_codes.pdf. Can be blank if country is US.
202-210	Reporting Business EIN or SSN/ITIN (Individual) (Item 41)	9	REQUIRED unless item 34 has an "X" entry. Enter the EIN of the reporting business or the SSN/ITIN if an individual. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789".
211-220	Reporting Business Phone number (Item 42)	10	REQUIRED unless item 34 has an "X" entry. Enter the entire phone number of the reporting business, including the area code.
221-242	Internal File/Report Number (Item 44)	22	Enter the tracking/identification number used by your internal system, if available. If item 34 is "X" leave this field blank.
243-470	Filler	228	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

7

Transaction Location Information (2B) Record - Required

This record identifies information on the transaction location where the activity occurred. The number of transaction location records is dependent on the number of different transaction locations being reported on the electronic file. There must be at least one 2B record. **For any required item that does not apply, enter "XX".** The 2B record item numbers refer to the SAR-MSB Form Part III.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2B".
3-7	Transaction Location Code	5	REQUIRED. Enter a unique numeric code for the different locations submitting SARs. This is to be right justified, and zero filled.
8	Multiple Transaction Locations (Item 22)	1	Enter "Y" if multiple locations were involved.

9	Type of Business Location (Item 23)	1	Enter one of the following:
			
			Code Description
			  A Selling location
			  B Paying location
			  C Both

10-64	Transaction Location Legal Name (Item 24)	55	REQUIRED. Enter the legal name of the transaction location.
65-119	Doing Business As Name (Item 25)	55	Enter the doing business as name.
120-169	Transaction Location Permanent Address (Item 26)	50	REQUIRED. Enter the permanent address of the transaction location. Do not abbreviate or use punctuation.
170-194	Transaction Location City (Item 27)	25	REQUIRED. Enter the transaction location city. Do not abbreviate or use punctuation.
195-196	Transaction Location State (Item 28)	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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

Field Position	Field Name	Length	Description and Remarks
197-205	Transaction Location ZIP Code (Item 29)	9	REQUIRED. Enter the ZIP Code for thetransaction location. 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. (ZIP+4 if known. Space fill as required. When entering a foreign postal code, left justify and space fill.)
206-207	Transaction Location Country (Item 32)	2	Enter the country code for the transaction location, if other than U.S. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.
208-216	Transaction Location EIN or SSN/ITIN (Individual) (Item 30)	9	REQUIRED. Enter the EIN of the transaction location or the SSN/ITIN if an individual. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789".
217-226	Transaction Location Business Phone Number (Item 31)	10	REQUIRED. Enter the entire phone number of the transaction location, including area code.
227-248	Internal File/Report Number	22	Enter the tracking/identification number used by your internal system, if available.
249-470	Filler	222	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

9

Transaction Location Information (2C) Record - Multiple Selling and/or Paying Business Locations

This record identifies information on the transaction location where the activity occurred. The number of transaction location records is dependent on the number of different transaction locations being reported on the electronic file. If the reported activity occurred at multiple selling and/or business locations provide the information. **For any required item that does not apply, enter "XX".** The 2C record item numbers refer to the SAR-MSB Form Part III.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2C".
3-7	Transaction Location Code	5	REQUIRED. Enter a unique number for the different locations submitting SARs. This is to be right justified, and zero filled.
8	Multiple Transaction Locations (Item 22)	1	REQUIRED. Enter "Y".
9	Type of Business Location (Item 23)	1	Enter one of the following: Code Description A Selling location B Paying location C Both
10-64	Transaction Location Legal Name (Item 24)	55	REQUIRED. Enter the legal name of the transaction location.
65-119	Doing Business As Name (Item 25)	55	Enter the doing business as name.
120-169	Transaction Location Permanent Address (Item 26)	50	REQUIRED. Enter the permanent address of the transaction location. Do not abbreviate or use punctuation.
170-194	Transaction Location City (Item 27)	25	REQUIRED. Enter the transaction location city. Do not abbreviate or use punctuation.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

10

Field Position	Field Name	Length	Description and Remarks
195-196	Transaction Location State (Item 28)	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.
197-205	Transaction Location ZIP Code (Item 29)	9	REQUIRED. Enter the ZIP Code for the transaction location. 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. (Zip+4 if known. Space fill as required. When entering a foreign postal code, left justify and space fill.).
206-207	Transaction Location Country Code (Item 32)	2	Select the appropriate country code, if other than US. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf. Can be blank if country is US.
208-216	Transaction Location EIN (Item 30)	9	REQUIRED. Enter the EIN of the transaction location. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789".
217-226	Transaction Location Business Phone Number (Item 31)	10	REQUIRED. Enter the entire phone number of the transaction location, including area code.
227-248	Internal File/Report Number	22	Enter the tracking/identification number used by your internal system if available.
249-470	Filler	222	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

11

Suspicious Activity Report (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-MSB Form Part II and Part V.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3A".
3-7	Transaction Code	5	REQUIRED. Enter the transaction number for the submitting transaction. This is to be right justified, and zero filled.
8-12	Suspicious Activity Record Sequence Number	5	REQUIRED. Enter a sequential number for each Suspicious Activity Report (3A) Record, starting with 00001 and incrementing by 1 for each different suspicious activity record. This field is to be right justified, and zero filled.
13-20	From Violation Date (Item 16)	8	REQUIRED. Enter the violation date or beginning violation date (if including a range of violation dates). Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY). Cannot be greater than date in Field Position 179-186, Date Filed (Item 47).
21-28	To Violation Date (Item 16)	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: month, day, century, year (MMDDCCYY). Cannot be greater than date in Field Position 179-186, Date Filed (Item 47).
29-43	Violation Amount (Item 17)	15	REQUIRED – unless item 17a is completed. Enter the total dollar amount involved in suspicious activity (must be numeric). If dollar amount is unknown, leave field blank and enter an "X" in item 17a.
44	Violation Amount Unknown (Item 17a)	1	REQUIRED if item 17 is unknown. If so, enter an "X".

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

12

Field Position	Field Name	Length	Description and Remarks

45-48	Category of Suspicious Activity (Item 18)	4	REQUIRED. Enter all that apply:
			
			Code Description
			  A Money laundering
			  B Structuring
			  C Terrorist financing
			  Z Other

49-73	Other Category of Suspicious Activity (Item 18z)	25	REQUIRED if "Z" entered in Category of Suspicious Activity (Item 18). Enter a brief description of the activity.

74-78	Financial Services Involved (Item 19)	5	REQUIRED, enter all that apply:
			
			Code Description
			  A Money order
			  B Traveler's check
			  C Money transfer
			  E Currency exchange
			  Z Other

79-103	Other (Item 19z)	25	REQUIRED if "Z" entered in Financial Services Involved (Item 19). Enter a brief description of the financial service.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

13

Field Position	Field Name	Length	Description and Remarks
104-113	Character of Suspicious Activity Continued (Item 19)	10	Enter all the numbers that apply, left justified and space filled with no spaces between multiple numbers. Code Description 1 Alters transaction to avoid completing funds transfer record or money order or traveler's check record ($3,000 or more) 2 Alters transaction to avoid filing CTR form (more than $10,000) 3 Comes in frequently and purchases less than $3,000 4 Changes spelling or arrangement of name 5 Individual(s) using multiple or false identification documents 6 Two or more individuals using the similar/same identification 7 Two or more individuals working together 8 Same individual(s) using multiple locations over a short time period 9 Offers a bribe in the form of a tip/gratuity 0 Exchanges small bills for large bills or vice versa
114-168	Contact Office (Item 45)	55	REQUIRED. Complete name of designated contact office.
169-178	Contact Telephone Number (Item 46)	10	REQUIRED. Enter the phone number of the contact office, including the area code. Can be "XX" if the Reporting Business Country (Item 43) on the 2A record field position 200-201 is not blank (U.S.) or the Transaction Location Country (Item 32) on the 2B record field position 206-207 is not blank (U.S.) when the Reporting Business same as Transaction Location Indicator (Item 34) on the 2A record is "X".
179-186	Date Filed (Item 47)	8	REQUIRED. Date report filed. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

14

Field Position	Field Name	Length	Description and Remarks
187-241	Contact Agency (Item 48)	55	Complete name of contact agency, if not filed by a money service business.
242-244	Number of Subjects	3	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 Report (3A) Record. Right justify and zero fill.
245-247	Number of Narrative Records	3	REQUIRED. Number of narrative records. Must be equal to the number of Narrative (7A) Records, which cannot be more than 99 for the same Suspicious Activity Report (3A) Record. Right justify and zero fill.
248	Amending/Correcting Indicator (Item 1)	1	Enter an "X" if this report amends or corrects a prior report.
249	Recurring Report Indicator (Item 1a)	1	Enter an "X" if this is a recurring report.
250-470	Filler	221	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

15

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 Report (3A) Record if there are multiple subjects (i.e. Item 2 has an entry of "X"). The 4A record item numbers refer to the SAR-MSB Form Part I.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4A".
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associated 3A record.
13	Multiple Subjects Indicator (Item 2)	1	Enter an "X" if there are multiple subjects.
14	Subject's Type (Item 3)	1	REQUIRED. Enter one of the following: Code Description A Purchaser/sender B Payee/receiver C Both a & b Z Other
15-49	Subject's Last Name or Entity Full Name (Item 4)	35	REQUIRED. Enter the last name of the subject or entity's full name.
50-68	Subject's First Name (Item 5)	19	REQUIRED. Enter the first name of the subject. If item 4 is an entity, enter "XX" in this item.
69	Subject's Middle Initial (Item 6)	1	Enter the middle initial of the subject.
70-119	Subject's Address (Item 7)	50	REQUIRED. Enter the street address of the subject. Do not abbreviate or use punctuation.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

16

Field Position	Field Name	Length	Description and Remarks
120-144	Subject's City (Item 8)	25	REQUIRED. Enter the city of the subject. Do not abbreviate or use punctuation.
145-146	Subject's State (Item 9)	2	REQUIRED. Enter the subject's state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.
147-155	Subject's ZIP Code (Item 10)	9	REQUIRED. Enter the ZIP Code for the subject. 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. (ZIP+4 if known. Space fill as required. When entering a foreign postal code, left justify and space fill.)
156-157	Subject's Country (Item 11)	2	REQUIRED. Enter the appropriate country code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf. Can be blank if country is US.
158	Subject's Identification (Item 12)	1	REQUIRED. Enter the appropriate code for identification provided as follows: Code Description A Driver's license/state ID B Passport C Alien registration Z Other
159-198	Subject's ID Other Description (Item 12z)	40	REQUIRED if "Z" entered in Subject's Identification (Item 12). Enter a brief description of the identification.
199-220	Subject's Identification Number (Item 12e)	22	REQUIRED unless "Subject's ID Other Description (Item 12z) is "XX". Enter the number used for identification. If the identification had no number, enter "XX" in this field

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

17

Field Position	Field Name	Length	Description and Remarks
221-222	Subject's Issuing State/Country (Item 12f)	2	REQUIRED unless "Subject's ID Other Description (Item 12z)" is "XX". Enter the appropriate code to designate the state or country where the identification was issued. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf. If the issuer is not a state or country on this list, enter "XX" in this field.
223-231	Subject's SSN/ITIN/EIN (Item 13)	9	REQUIRED. Enter the subject's ITIN, EIN or SSN. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789".
232-239	Subject's Date of Birth (Item 14)	8	REQUIRED. Enter the subject's date of birth. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY). If month and/or day is not available or unknown, fill in with zeros (e.g., 01/00/1969). If entire date is unknown, enter "XX" in the MM part of the date field.
240-249	Subject's Telephone Number (Item 15)	10	Enter the phone number of the subject, including the area code.
250-470	Filler	221	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

18

Money Orders Information (5A) Record

This record contains information related to the money orders used. This record can hold multiple instrument information. Multiple money order purchases or redemptions involving the same issuer should be aggregated into single entries. If there are more than three money order entries associated with the activity, additional 5A records may be added as needed. The 5A record item numbers refer to the money order fields in item 20 in the SAR-MSB Form Part II.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "5A".
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
13	Money Order1 (Item 20)	1	Enter a "P" for Purchases or an "R" for Redemptions for issuer 1.
14-68	Issuer Name1 (Item 20)	55	Enter the name of the issuer of the instrument(s).
69-71	Total Instruments1 (Item 20)	3	Enter the total number of money orders for issuer 1.
72-86	Total US Dollars Amount1 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 1.
87	Money Orders2 (Item 20)	1	Enter "P" for Purchases or an "R" for Redemptions for issuer 2.
88-142	Issuer Name2 (Item 20)	55	Enter the name of the issuer of the instrument(s).
143-145	Total Instruments2 (Item 20)	3	Enter the total number of money orders for issuer 2.
146-160	Total US Dollars Amount2 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 2.
161	Money Orders3 (Item 20)	1	Enter "P" for Purchases or an "R" for Redemptions for issuer 3.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

19

Field Position	Field Name	Length	Description and Remarks
162-216	Issuer Name3 (Item 20)	55	Enter the name of the issuer of the instrument(s).
217-219	Total Instruments3 (Item 20)	3	Enter the total number of money orders for issuer 3.
220-234	Total US Dollars Amount3 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 3.
235-470	Filler	236	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

20

Traveler's Checks Information (5B) Record

This record contains information related to the traveler's check used. This record can hold multiple instrument information. Multiple traveler's check purchases or redemptions involving the same issuer should be aggregated into single entries. If there are more than three traveler's check entries associated with the activity, additional 5B records may be added as needed. The 5B record item numbers refer to the traveler's check fields in item 20 in the SAR-MSB Form Part II.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "5B".
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8 -12	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associated 3A record.
13	Traveler's Checks1 (Item 20)	1	Enter "P" for Purchases or an "R" for Redemptions for issuer 1.
14-68	Issuer Name1 (Item 20)	55	Enter the name of the issuer of the instrument.
69-71	Total Instruments1 (Item 20)	3	Enter the total number of traveler's checks for issuer 1.
72-86	Total US Dollars Amount1 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 1.
87	Traveler's Checks2 (Item 20)	1	Enter "P" for Purchases or an "R" for Redemptions for issuer 2.
88-142	Issuer Name2 (Item 20)	55	Enter the name of the issuer of the instrument.
143-145	Total Instruments2 (Item 20)	3	Enter the total number of traveler's checks for issuer 2.
146-160	Total US Dollars Amount2 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 2.
161	Traveler's Checks3 (Item 20)	1	Enter "P" for Purchases or an "R" for Redemptions for issuer 3.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

21

Field Position	Field Name	Length	Description and Remarks
162-216	Issuer Name3 (Item 20)	55	Enter the name of the issuer of the instrument.
217-219	Total Instruments3 (Item 20)	3	Enter the total number of traveler's checks for issuer 3.
220-234	Total US Dollars Amount3 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 3.
235-470	Filler	236	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

22

Money Transfers Information (6A) Record

This record contains information related to the money transfers used. This record can hold multiple money transfer information. Multiple money transfer purchases or redemptions involving the same issuer should be aggregated into single entries. If there are more than three money transfer entries associated with the activity, additional 6A records may be added as needed. The 6A record item numbers refer to the money transfer fields in item 20 in the SAR-MSB Form Part II.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "6A".
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
13	Money Transfers1 (Item 20)	1	Enter "P" if subject is sending money or an "R" if subject is receiving money.
14-68	Issuer Name1 (Item 20)	55	Enter the name of the issuer of the money transfer.
69-71	Total Instruments1 (Item 20)	3	Enter the total number of money transfers.
72-86	Total US Dollars Amount1 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 1.
87	Money Transfers2 (Item 20)	1	Enter "P" if subject is sending money or an "R" if subject is receiving money.
88-142	Issuer Name2 (Item 20)	55	Enter the name of the issuer of the money transfer.
143-145	Total Instruments2 (Item 20)	3	Enter the total number of money transfers.
146-160	Total US Dollars Amount2 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 2.
161	Money Transfers3 (Item 20)	1	Enter "P" if subject is sending money or an "R" if subject is receiving money.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

23

Field Position	Field Name	Length	Description and Remarks
162-216	Issuer Name3 (Item 20)	55	Enter the name of the issuer of the money transfer.
217-219	Total Instruments3 (Item 20)	3	Enter the total number of money transfers.
220-234	Total US Dollars Amount3 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 3.
235-470	Filler	236	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

24

Currency Exchange Information (6B) Record

This record contains information related to the currency exchanges used. This record can hold multiple currency exchange information. If more than two currency exchanges occurred for the same activity, additional 6B records may be added as needed. The 6B record item numbers refer to the currency exchange fields in item 21 in the SAR-MSB Form Part II.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "6B".
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associated 3A record.
13	Bulk Small Indicator1 (Item 21)	1	Enter an "X" if bulk small currency was involved in the transaction(s).
14-33	Tendered Currency/ Instrument1 (Item 21)	20	Enter the name of the tendered currency or type of monetary instrument used to pay for the exchange.
34-35	Tendered Currency Country1 (Item 21)	2	Enter the appropriate country code for the country that issued the currency. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.
36-55	Received Currency1 (Item 21)	20	Enter the name of the currency received in the exchange.
56-57	Received Currency Country1 (Item 21)	2	Enter the appropriate country code for the country that issued the currency. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.
58-72	US Dollars Amount1 (Item 21)	15	Enter total US Dollar amount rounded up to the nearest whole dollar (must be numeric) in the exchange.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

25

Field Position	Field Name	Length	Description and Remarks
73	Bulk Small Indicator2 (Item 21)	1	Enter an "X" if bulk small currency was involved in the transaction(s).
74-93	Tendered Currency/ Instrument2 (Item 21)	20	Enter the name of the tendered currency or type of monetary instrument used to pay for the exchange.
94-95	Tendered Currency Country2 (Item 21)	2	Enter the appropriate country code for the country that issued the currency. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.
96-115	Received Currency2 (Item 21)	20	Enter the name of the currency received in the exchange.
116-117	Received Currency Country2	2	Enter the appropriate country code for the country that issued the currency. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.
118-132	US Dollars Amount2	15	Enter total US Dollar amount rounded up to the nearest whole dollar (must be numeric) in the exchange.
133-470	Filler	338	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

26

Narrative (7A) Record - Required

This record contains a detailed narrative of known or suspicious violation of law. This record may occur multiple times, but no more than 99 times for the same Suspicious Activity Report (3A) Record. **NO CARRIAGE RETURNS ALLOWED.**   The 7A Record refers to the SAR-MSB Form Part VI.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "7A".
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associated 3A record.
13-470	Narrative (Part VI)	458	REQUIRED. Enter a detailed narrative of the Suspicious Activity. Upper case characters only. Do not use low values, special characters or charts/tables.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

27

Transaction Location Summary (9A) Record - Required

There should be a 9A record for each Transaction Location Information (2B) Record in the file. The 9A record will immediately follow the last Narrative (7A) Record associated with the 2B record. The 9A record contains the counts of the number of each type of record associated with the 2B record transaction location.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "9A".
3-7	Transaction Code	5	REQUIRED. Enter the transaction number for the 2B transaction location. Right justified and zero filled.
8-14	Transaction Location Count	7	REQUIRED. Enter a count of the number of Transaction Location Information (2B) Records for the 2B transaction location.
15-21	Suspicious Activity Count	7	REQUIRED. Enter a count of the number of Suspicious Activity Report (3A) Records for the 2B transaction location.
22-28	Subject Record Count	7	REQUIRED. Enter the number of Subject Information (4A) Records for the 2B transaction location.
29-35	Narrative Count	7	REQUIRED. Enter the number of Narrative (7A) Records for the 2B transaction location.
36-470	Filler	435	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

28

Parent Money Services Business Summary (9B) Record - Required

There should be a 9B record in the file for each Parent Reporting Business Headquarters (2A) Record in the file. The 9B record will follow the last Transaction Location Summary (9A) Record associated with the 2A record. The 9B record contains counts of the number of each type of record associated with the 2A reporting business.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "9B".
3-9	Transaction Location Information Record Count	7	REQUIRED. Enter count of Transaction Location Information (2B) Records for the financial institution.
10-16	SAR-MSB Count	7	REQUIRED. Enter count of Suspicious Activity Report (3A) Records.
17-23	Subject Record Count	7	REQUIRED. Enter count of Subject Information (4A) Records.
24-30	Narrative Count	7	REQUIRED. Enter count of Narrative (7A) Records.
31-470	Filler	440	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

29

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.

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 Money Services Business Summary (9B) Records.
10-16	Transaction Location Information Record Count	7	REQUIRED. Enter count of Transaction Location Information (2B) Records.
17-23	SAR-MSB Count	7	REQUIRED. Enter count of Suspicious Activity Report (3A) Records.
24-30	Subject Record Count	7	REQUIRED. Enter count of Subject Information (4A) Records.
31-37	Narrative Count	7	REQUIRED. Enter count of Narrative (7A) Records.
38-470	Filler	433	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

30

Acknowledgement Record Formats

The SAR-MSB 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/SARMSBAcknowledgementData.xsd

Acknowledgement Transmitter (1A) 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 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 218-225 of the incoming "1A" record. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
11-18	Coverage Ending Date	8	From positions 226-233 of the incoming "1A" record. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
19-26	Transmitter Control Code (TCC)	8	From positions 234-241 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

31

Acknowledgement Parent Reporting Business Headquarters (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 Reporting Business Headquarters (2A) Record data received.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2A".
3-57	Reporting Business Name	55	From positions 4-58 of the incoming "2A" record.
58-87	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.
88-90	Filler	3	Space Filled.

Acknowledgement Transaction Location Information (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 Transaction Location Information (2B) Record data received.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2B".
3-7	Transaction Location Code	5	From positions 3-7 of the incoming "2B" 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

32

Acknowledgement Transaction Location Information (2C) Record – Multiple Selling and/or Paying Business Locations

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 Transaction Location Information (2C) Record - Multiple Selling and/or Paying Business Locations data received for each additional transaction location.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2C".
3-7	Transaction Location Code	5	From positions 3-7 of the incoming "2C" 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.

Acknowledgement Suspicious Activity Report (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 (3A) Record data received.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3A".
3-7	Suspicious Activity Record 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

33

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 Information 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

34

Acknowledgement Money Orders Information (5A) 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 money orders information data received for each 5A Record submitted. Note: there will be one Acknowledgement Money Orders Information (5A) Record for every incoming Money Orders Information (5A) Record in the original transaction.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "5A".
3-7	Transaction Sequence Number	5	From positions 8-12 of the incoming "5A" 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

35

Acknowledgement Traveler's Checks Information (5B) 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 traveler's checks information data received for each 5B record submitted. Note: there will be one Acknowledgement Traveler's Checks Information (5B) Record for every incoming Traveler's Checks Information (5B) Record in the original transaction.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "5B".
3-7	Transaction Sequence Number	5	From positions 8-12 of the incoming "5B" 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

36

Acknowledgement Money Transfers Information (6A) 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 money transfers information data received for each 6A record submitted. Note: there will be one Acknowledgement Money Transfers Information (6A) Record for every incoming Money Transfers Information (6A) Record in the original transaction.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "6A".
3-7	Transaction Sequence Number	5	From positions 8-12 of the incoming "6A" 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

37

Acknowledgement Currency Exchange Information (6B) 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 currency exchange information data received for each 6B Record submitted. Note: there will be one Acknowledgement Currency Exchange Information (6B) Record for every incoming Currency Exchange Information (6B) Record in the original transaction.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "6B".
3-7	Transaction Sequence Number	5	From positions 8-12 of the incoming "6B" 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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

38

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 Reporting Business Headquarters (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.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

39

Attachment A – Definitions

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

Term	Description
Instruments	As used in this form includes currency, money orders, and traveler's checks.
Subject	A Subject is a person with questionable/suspicious activities.

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

40

Attachment B - Error Code List

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

All F error codes will result in rejection of batch files (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.			
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.			
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 7A 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.			

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

41

Error Code	Error Description	Record	Field Position	Form Field Number
F35	A missing, invalid, or non-numeric "Transaction Code"/"Transaction Location Code" was present on the submitted file.	2B, 2C,3A, 4A, 5A,5B, 6A,6B,7A, 9A	3-7	
F36	A missing, invalid, or non-numeric "Suspicious Activity Record Sequence Number"/"Transaction Sequence Number" was present on the submitted file.	3A,4A,5A, 5B,6A,6B,7A	8-12	
F37	A duplicate "Transaction Sequence"/"Transaction Sequence Number" was present on the submitted file.			
F88	The Transmitter Control Code (TCC) specified in the file is not a valid production TCC code.	1A	234 - 241	
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.			

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

42

Error Code	Error Description	Record	Field Position	Form Field Number
The following error codes apply to SAR-MSB fields in the Acknowledgement 2A, 2B, 2C, 3A, 4A, 5A, 5B, 6A, 6B, and 7A 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.				
M01	"Reporting Business same as Transaction Location Indicator" is checked but Reporting Business Name and Address information not blank or "Reporting Business same as Transaction Location Indicator" is invalid.	2A	3	34
M02	"Reporting Business Name" is missing or invalid.	2A	4-58	35
M03	"Reporting Business Address" is missing or invalid.	2A	114-163	37
M04	"Reporting Business City" is missing or invalid.	2A	164-188	38
M05	"Reporting Business State" is missing or invalid.	2A	189-190	39
M06	"Reporting Business ZIP" is missing or invalid.	2A	191-199	40
M07	"Reporting Business Country" is invalid.	2A	200-201	43
M08	"Reporting Business EIN or SSN/TIN (Individual)" is missing or invalid, or the value is "XX" when the "Reporting Business Country" is blank or "US."	2A	202 - 210	41
M09	"Reporting Business Phone" number is missing or invalid.	2A	211 - 220	42
M10	"Type of Business Location" is invalid.	2B	9	23
M11	"Transaction Location Legal Name" is missing or invalid.	2B	10 - 64	24
M12	"Transaction Location Permanent Address" is missing or invalid.	2B	120 - 169	26
M13	"Transaction Location City" is missing or invalid.	2B	170 - 194	27

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

43

Error Code	Error Description	Record	Field Position	Form Field Number
M14	"Transaction Location State" is missing or invalid.	2B	195 - 196	28
M15	"Transaction Location ZIP Code" is missing or invalid.	2B	197 - 205	29
M16	"Transaction Location Country" is missing or invalid.	2B	206 - 207	32
M17	"Transaction Location EIN or SSN/ITIN (Individual)" is missing or invalid.	2B	208 - 216	30
M18	"Transaction Location Business Phone Number" is missing or invalid.	2B	217 - 226	31
M19	"Multiple Transaction Locations" is invalid.	2B & 2C	8	22
M20	"Type of Business Location" is invalid.	2C	9	23
M21	"Transaction Location Legal Name" of business is missing.	2C	10 - 64	24
M22	"Transaction Location Permanent Address" is missing.	2C	120 - 169	26
M23	"Transaction Location City" is missing.	2C	170 - 194	27
M24	"Transaction Location State" is missing or invalid.	2C	195 - 196	28
M25	"Transaction Location ZIP Code" is missing or invalid.	2C	197 - 205	29
M26	"Transaction Location Country" is invalid.	2C	206 - 207	32
M27	"Transaction Location EIN" is missing or invalid.	2C	208 - 216	30
M28	"Transaction Location Business Phone Number" is missing or invalid.	2C	217 - 226	30
M29	"From Violation Date" is missing, invalid, or more recent than "Date Filed."	3A	13 - 20	16
M30	"To Violation Date" is invalid, more recent than "Date Filed," or earlier than "From Date."	3A	21 - 28	16
M31	"Violation Amount " is missing or invalid.	3A	29 - 43	17
M32	"Violation Amount Unknown" is invalid.	3A	44	17a

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

44

Error Code	Error Description	Record	Field Position	Form Field Number
M33	"Category of Suspicious Activity" is missing, is invalid, or has duplicates.	3A	45 - 48	18
M34	"Other category of Suspicious Activity" is missing when "Category of Suspicious Activity" contains "Z."	3A	49 - 73	18z
M35	"Financial Services Involved" is missing, is invalid, or has duplicates.	3A	74 - 78	19
M36	"Other" is missing when "Financial Services Involved" contains "Z."	3A	79 - 103	19z
M37	"Character of Suspicious Activity Continued" is invalid or has duplicates.	3A	104 - 113	19
M38	"Contact Office" is missing.	3A	114 - 168	45
M39	"Contact Telephone Number" is missing or invalid.	3A	169 - 178	46
M40	"Date Filed" is missing, invalid, or more recent than date transmitted.	3A	179 - 186	47
M41	"Amending/Correcting Indicator" is invalid.	3A	248	1
M42	"Recurring Report Indicator" is invalid.	3A	249	1a
M43	"Multiple Subjects Indicator" is invalid or there is only one subject.	4A	13	2
M44	"Subject's Type" is invalid or missing.	4A	14	3
M45	"Subject's Last Name or Entity Full Name" is missing.	4A	15 - 49	4
M46	"Subject's First Name" is missing.	4A	50 - 68	5
M47	"Subject's Address" is missing.	4A	70 - 119	7
M48	"Subject's City" is missing.	4A	120 - 144	8
M49	"Subject's State" is missing or invalid.	4A	145 - 146	9
M50	"Subject's ZIP Code" is missing or invalid.	4A	147 - 155	10
M51	"Subject's Country" is invalid.	4A	156 - 157	11
M52	"Subject's Identification" is missing or invalid.	4A	158	12
M53	"Subject's SSN/ITIN/EIN" is missing or invalid.	4A	223 - 231	13

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

45

Error Code	Error Description	Record	Field Position	Form Field Number
M54	"Subject's Date of Birth" is missing, invalid, or more recent than "Date Filed."	4A	232 - 239	14
M55	"Subject's Telephone Number" is invalid.	4A	240 - 249	15
M56	"Subject's Identification Number" is missing.	4A	199 - 220	12e
M57	"Subject's Issuing State/Country" is missing or invalid.	4A	221 - 222	12f
M58	"Subject's ID Other Description" is missing.	4A	159 - 198	12z
M59	"Narrative" is missing or contains one or more blank records.	7A	13 - 470	Part VI
B01	"Money Order1" is invalid.	5A	13	20
B02	"Issuer Name1" value is not the Issuer Name.	5A	14 - 68	20
B03	"Total Instruments1" is invalid.	5A	69 - 71	20
B04	"Total US Dollars Amount1" is invalid.	5A	72 - 86	20
B05	"Money Orders2" is invalid.	5A	87	20
B06	"Issuer Name2" value is not the Issuer Name.	5A	88 - 142	20
B07	"Total Instruments2" is invalid.	5A	143 - 145	20
B08	"Total US Dollars Amount2" is invalid.	5A	146 - 160	20
B09	"Money Order3" is invalid.	5A	161	20
B10	"Issuer Name3" value is not the Issuer Name.	5A	162 - 216	20
B11	"Total Instruments3" is invalid.	5A	217 - 219	20
B12	"Total US Dollars Amount3" is invalid.	5A	220 - 234	20
B13	"Traveler's Checks1" is invalid.	5B	13	20
B14	"Issuer Name1" value is not the Issuer Name.	5B	14 - 68	20
B15	"Total Instruments1" is invalid.	5B	69 - 71	20
B16	"Total US Dollars Amount1" is invalid.	5B	72 - 86	20
B17	"Traveler's Checks2" is invalid.	5B	87	20
B18	"Issuer Name2" value is not the Issuer Name.	5B	88 - 142	20
B19	"Total Instruments2" is invalid.	5B	143 - 145	20
B20	"Total US Dollars Amount2" is invalid.	5B	146 - 160	20

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

46

Error Code	Error Description	Record	Field Position	Form Field Number
B21	"Traveler's Checks3" is invalid.	5B	161	20
B22	"Issuer Name3" value is not the Issuer Name.	5B	162 - 216	20
B23	"Total Instruments3" is invalid.	5B	217 - 219	20
B24	"Total US Dollars Amount3" is invalid.	5B	220 - 234	20
B25	"Money Transfers1" is invalid.	6A	13	20
B26	"Issuer Name1" value is not the Issuer Name.	6A	14 - 68	20
B27	"Total Instruments1" is invalid.	6A	69 - 71	20
B28	"Total US Dollars Amount1" is invalid.	6A	72 - 86	20
B29	"Money Transfers2" is invalid.	6A	87	20
B30	"Issuer Name2" value is not the Issuer Name.	6A	88 - 142	20
B31	"Total Instruments2" is invalid.	6A	143 - 145	20
B32	"Total US Dollars Amount2" is invalid.	6A	146 - 160	20
B33	"Money Transfers3" is invalid.	6A	161	20
B34	"Issuer Name3" value is not the Issuer Name.	6A	162 - 216	20
B35	"Total Instruments3" is invalid.	6A	217 - 219	20
B36	"Total US Dollars Amount3" is invalid.	6A	220 - 234	20
B37	"Bulk Small Indicator1" is invalid.	6B	13	21
B39	"Tendered Country1" is invalid.	6B	34 - 35	21
B41	"Received Country1" is invalid.	6B	56 - 57	21
B42	"US Dollars Amount1" is invalid.	6B	58 - 72	21
B43	"Bulk Small Indicator2" is invalid.	6B	73	21
B45	Tendered Country2 is invalid.	6B	94 - 95	21
B47	"Received Country2" is invalid.	6B	116 - 117	21
B48	"US Dollars Amount2" is invalid.	6B	118 - 132	21

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

47

Attachment C – Field Editing Instructions

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

A. Delete any name titles, prefixes, suffixes or other descriptive information such as Mr., Mrs., Dr., Reverend, Partner, Trustee, JR, or III.

B. Delete all punctuation (e.g. "INC." would be entered as "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. Multiple/compound surnames. Care must be taken in formatting foreign multiple and compound surnames that consist of multiple names. Foreign multiple surnames must be entered without punctuation in the last name field. For example, Spanish names with multiple surnames 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 together without punctuation in the last name field (e.g. as VEGA SANTIAGO). Compound surnames are entered with spaces and without punctuation in the last name field (e.g. VON BRAUN).

BSA Electronic Filing Requirements For Suspicious Activity Report by Money Services Business (SAR-MSB) (FinCEN Form 109)

48