



## Department of the Treasury Financial Crimes Enforcement Network

### **FIN-2009-G005**

**Issued: December 10, 2009 (Amended December 14, 2009)**

**Subject: Requirements for Correcting Errors in Electronically Batch-Filed Suspicious Activity Reports**

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The Financial Crimes Enforcement Network (FinCEN) is issuing these guidelines to assist users of the Bank Secrecy Act (BSA) E-Filing System in correcting errors in batch-filed Suspicious Activity Reports (SARs)<sup>1</sup>.

#### **Background:**

On September 12, 2009, FinCEN implemented a system for providing acknowledgements to filers for Suspicious Activity Reports (SARs) filed through the BSA E-Filing System. The acknowledgements, similar to those for Currency Transaction Reports (CTR), provide filers with evidence that their SARs were received. SAR acknowledgements include the Document Control Number (DCN) assigned to each document. Discrete BSA E-filers receive acknowledgements automatically. Batch BSA E-Filers must sign up to receive acknowledgement files that contain a record with DCNs for each SAR in their batch files.<sup>2</sup>

On December 12, 2009, FinCEN will implement data validation on all batch-filed SARs. All batch filers will receive E-mail notifications when there are errors in their submitted SAR batch files.<sup>3</sup> Filers signed up to receive acknowledgements will also receive error notifications in their acknowledgement files.<sup>4</sup> The following guidelines provide batch filers with the requirements for correcting errors identified in submitted batch files and preventing errors in future submissions.

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<sup>1</sup> For purposes of this document, "SAR" collectively refers to the Suspicious Activity Report by Casinos and Card Clubs (SAR-C), the depository institution Suspicious Activity Report (SAR-DI), the Suspicious Activity Report by Money Services Business (SAR-MSB), and the Suspicious Activity Report by the Securities and Futures Industries (SAR-SF).

<sup>2</sup> Complete details on BSA E-filing SAR acknowledgements are found in the document "BSA E-Filing System SAR Acknowledgements and Validations Questions and Answers Guide" available on BSA E-Filing's public Internet site at <http://bsaeifiling.fincen.treas.gov/main.html>.

<sup>3</sup> These notifications state that batch files were accepted with warnings, i.e. that they contained errors. Filers can obtain the batch file error lists through the Track Status Page and Submission Errors Page in the BSA E-Filing System.

<sup>4</sup> Discrete BSA E-Filers will not receive error codes in their acknowledgements because the discrete BSA E-Filing SAR forms are designed to prevent the types of errors being looked for in batch files.

## **Error Categories:**

For purposes of these guidelines, errors have been divided into primary and secondary categories. Primary errors are those that so degrade the quality of the SAR data that they must be corrected. Primary errors make it difficult for analysts and law enforcement investigators to locate the SARs in the database or identify the nature and circumstances of the suspicious activity. Examples of such errors include blank narratives, missing financial institution Employer Identification Numbers, or formatting errors. **FinCEN requires that filers submit corrected SARs for all SARs containing primary errors.**

Secondary errors are those that violate electronic filing requirements or form instructions but do not seriously degrade the quality of the SAR data. Examples of secondary errors are ZIP Codes that end in four zeros (e.g. 123450000), blank or invalid filer branch information, or invalid subject telephone numbers. **FinCEN requires that filers prevent reported secondary errors in their future filings.** Filers should not submit a corrected SAR if a SAR contains only secondary errors, but they should correct secondary errors found in a SAR that also contains primary errors.

## **Correction Requirements:**

Filers must submit corrected SARs through the BSA E-Filing System. FinCEN recommends that primary error corrections be made no later than 30 days after receiving error notifications. Furthermore, FinCEN recommends that filers remedy any systemic problems in their electronic submissions within 30 days of receiving error notifications. **If technical issues prevent filers from implementing corrections within these time frames, they should notify FinCEN by writing to:**

Financial Crimes Enforcement Network  
Office of Compliance  
P.O. Box 39  
Vienna, VA 22183.

This notification should explain the technical issues involved, why the time frame(s) cannot be met, provide an estimate of when the issues will be resolved, and include a contact name and telephone number.

## **Correction Procedures:**

Filers must prepare corrected SARs using the following procedures:

- Make the corrections to the SAR data that contain errors.
- Include a description of the correction in the narrative.

- Filers who receive SAR acknowledgements must include the DCN of the original SAR in the narrative.
- Check box 1 to indicate that the SAR corrects a previous SAR filing.
- Change the “Date report prepared” (SAR-C, SAR-DI, and SAR-SF) or “Date filed” (SAR-MSB) to the current date.

### **BSA E-Filer Support:**

The BSA E-Filing System Help Desk will provide technical support for all users. The BSA E-Filing Help Desk can be contacted by calling 1-888-827-2778 (option 6) or by email at [BSAEFilingHelp@notes.tcs.treas.gov](mailto:BSAEFilingHelp@notes.tcs.treas.gov). The Help Desk’s regular hours of operation are 8:00 a.m. to 6:00 p.m. East Coast Time, Monday through Friday. Please note that the Help Desk is closed on Federal holidays.

Users can address general questions about preparing corrected SARs to FinCEN’s Regulatory Helpline at 1-800-949-2732. Helpline staff is available from 8 a.m. to 5 p.m. East Coast Time, Monday through Friday. The office is closed on Federal holidays.

### **Primary and Secondary SAR Errors:**

The following appendices list the primary and secondary errors for each SAR form.

Appendix A: Guidelines for Correcting Errors in the Electronically-Batch Filed Suspicious Activity Report by Casinos and Card Clubs, FinCEN Form 102.

Appendix B: Guidelines for Correcting Errors in Electronically-Batch Filed Suspicious Activity Reports, TD F 90-22.47.

Appendix C: Guidelines for Correcting Errors in the Electronically-Batch Filed Suspicious Activity Report by Money Services Business, FinCEN Form 109.

Appendix D: Guidelines for Correcting Errors in Electronically-Batch Filed Suspicious Activity Reports by the Securities and Futures Industries, FinCEN Form 101.

[UPDATE: As of July 31, 2010, the toll free number for the BSA E-Filing Service Desk is 1-866-346-9478 (Option 1). The email address is now [BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov).]

Appendix A: Requirements for Correcting Errors in the Electronically-Batch Filed Suspicious Activity Report by Casinos and Card Clubs, FinCEN Form 102.

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The Financial Crimes Enforcement Network (FinCEN) is issuing these guidelines to assist users of the Bank Secrecy Act (BSA) E-Filing System in correcting errors in batch-filed Suspicious Activity Reports by Casinos and Card Clubs (SAR-C), FinCEN Form 102.

**Primary Errors:**

The following SAR-C errors are primary and must be corrected.

<b>Error Code</b>	<b>Error Description<sup>1</sup></b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
A01	"Casino/Card Club Trade" Name is missing.	2A	8 – 42	32
A06	"Casino/Card Club EIN" is missing or invalid.	2A	144 – 152	34
A11	"Contact Area Code" is missing or invalid.	2A	250 – 252	44
A12	"Contact telephone" is missing or invalid.	2A	253 - 259	44
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
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
A26	"Subject's Name" is missing.	4A	8 – 42	3-5
A32	"Subject's TIN" is invalid.	4A	146 - 154	14
A49	"Explanation/Description" of the suspicious activity is missing or contains one or more blank records.	6A	8 - 403	Part VI

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<sup>1</sup> 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 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.

**Secondary Errors:**

The following SAR-C errors are secondary. They must be corrected only when there are primary errors in the same SAR-C.

<b>Error Code</b>	<b>Error Description<sup>2</sup></b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
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
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
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	27
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

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<sup>2</sup> Ibid.

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
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
A23	"Corrects Prior Report Indicator" is invalid.	3A	144 – 144	1
A24	"Suspect Information Unavailable" is selected but 4A record exists.	3A	145 – 145	2b
A25	"Multiple Subject Indicator" is "X" but contains only one subject record.	3A	146 – 146	2a
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 invalid.	4A	135 - 143	11
A31	"Subject's Country Code" is invalid.	4A	144 - 145	12
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

	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
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
A50	"Subject's Identification Number" is missing.	4A	264 – 285	17c
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
A51	"Subject's Account Number" is missing.	4A	298 – 319	15
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
A48	"Subject Action Date" is missing, invalid or more recent than "Prepared Date."	4A	330 – 337	23

Appendix B: Requirements for Correcting Errors in Electronically-Batch Filed Suspicious Activity Reports, TD F 90-22.47.

The Financial Crimes Enforcement Network (FinCEN) is issuing these guidelines to assist users of the Bank Secrecy Act (BSA) E-Filing System in correcting errors in batch-filed depository institution Suspicious Activity Reports (SAR-DI), TD F 90-22.47.

**Primary Errors:**

The following SAR-DI errors are primary and must be corrected.

<b>Error Code</b>	<b>Error Description<sup>1</sup></b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
S01	"Financial Institution Name" is missing.	2A	3 - 37	2
S02	"Institution EIN" is missing or invalid.	2A	105 - 113	3
S04	"Primary Federal Regulator" code is invalid.	2A	104	5
S10	"Contact Area Code" is missing or invalid.	2B	161 - 163	49
S11	"Contact Phone Number" is missing or invalid.	2B	164 - 170	50
S14	"From Violation Date" is missing, invalid, or more recent than the "Date Prepared."	3A	241 - 248	33
S16	"Violation Amount" is missing or not numeric.	3A	257 - 266	34
S17	"Violation Type" is missing, is invalid, or contains duplicates.	3A	267 - 276	35
S40	"Suspect's TIN" is invalid.	4A	118 - 126	19
S59	"Explanation/Description of the suspicious activity" is missing or contains one or more blank records.	6A	15 - 410	Part V

**Secondary Errors:**

The following SAR-DI errors are secondary. They must be corrected only when there are primary errors in the same SAR-DI.

<sup>1</sup> 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 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.



<b>Error Code</b>	<b>Error Description<sup>2</sup></b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
S03	"Institution Address" is missing.	2A	38 - 67	4
S05	"Institution City" is missing.	2A	68 - 92	6
S06	"Institution State" is missing or invalid.	2A	93 - 94	7
S07	"Institution ZIP Code" is missing or invalid.	2A	95 - 103	8
S08	"Branch Office State" is invalid.	2B	65 - 66	11
S09	"Branch Office ZIP Code" is invalid.	2B	67 - 75	12
S12	"Contact Name" is missing. The name of at least a contact office must be provided.	2B	86 - 120	45-47
S13	"Corrects Prior Report Indicator" is invalid.	3A	352	1
S15	"To Violation Date" is invalid, more recent than "Date Prepared," or earlier than "From Violation Date."	3A	249 - 256	33
S18	"Amount of Loss" is greater than "Violation Amount" or not numeric.	3A	317 - 326	36
S19	"Amount of Recovery" is greater than "Amount of Loss" or not numeric.	3A	327 - 336	37
S20	"Material Impact Indicator" is not A, B, or blank.	3A	337	38
S21	"Bonding Company Notified" value is not A, B, or blank.	3A	338	39
S22	"Law Enforcement Agencies Advised" is invalid or contains duplicates.	3A	107 - 115	40
S23	"Law Enforcement Agency Phone Number Area Code" is invalid.	3A	186 - 188	42
S24	"Law Enforcement Agency Phone Number" is invalid.	3A	189 - 195	42
S25	"Law Enforcement Agency Phone Number Area Code" is invalid.	3A	231 - 233	44
S26	"Law Enforcement Agency Phone Number" is invalid.	3A	234 - 240	44

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<sup>2</sup> Ibid.

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
S28	"Account Closed Indicator" is missing when an account number was provided, or the indicator is invalid.	3A	37	14a
S30	"Account 2 Closed Indicator" is missing when an account number was provided, or the indicator is invalid.	3A	60	14b
S32	"Account 3 Closed Indicator" is missing when an account number was provided, or the indicator is invalid.	3A	83	14c
S34	"Account 4 Closed Indicator" is missing when an account number was provided, or the indicator is invalid.	3A	106	14d
S35	"Violation Type - Other" was selected and description is missing.	3A	277 - 316	35s
S36	"Law Enforcement Agency Name" is missing when "Law Enforcement Agencies Advised" contains G, H, or I.	3A	116 - 150	40j
S37	"Prepared Date" is missing, invalid, or more recent than the current date.	3A	339 - 346	50
S38	"Multiple Branch Code" is invalid.	3A	351	9
S39	"Suspect Information Unavailable" is selected and a 4A record exists or "Suspect Information Unavailable" is not selected and a 4A record does not exist.	3A	353	Part II
S41	"Suspect's State" is invalid.	4A	105 - 106	21
S42	"Suspect's ZIP Code" is invalid.	4A	107 - 115	22
S43	"Suspect's Country" code is invalid.	4A	116 - 117	23
S44	"Suspect's Area Code" is invalid.	4A	135 - 137	24
S45	"Suspect's Phone Number" is invalid.	4A	138 - 144	24
S46	"Suspect's Work Area Code" is invalid.	4A	145 - 147	25
S47	"Suspect's Work Phone Number" is invalid.	4A	148 - 154	25
S48	"Suspect's Occupation" contains invalid characters.	4A	155 - 184	26

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
S49	"Suspect's Date of Birth" is invalid, or more recent than the "Date Prepared."	4A	127 - 134	27
S50	"Suspect Admission/Confession Indicator" is not A, B, or blank.	4A	304	28
S51	"Suspect's Identification" value is not A, B, C, D, or blank.	4A	185	29
S52	"Suspect ID Issuing Authority" is invalid.	4A	248 - 249	29
S53	"Suspect's ID Other" was selected and description is missing.	4A	186 - 225	29d
S54	"Suspect's Relationship" is invalid or contains duplicates.	4A	250 - 253	30
S55	"Suspect's Relationship Other" was selected and description is missing.	4A	254 - 293	30L
S56	"Suspect's Affiliation" value is not A, B, or blank.	4A	294	31
S57	"Suspect's Affiliation" is an insider relationship, and "Suspect's Affiliation Code" is missing or invalid.	4A	295	31
S58	"Suspect Termination Date" is missing or invalid when the "Suspect's Affiliation Code" is D, E, or F.	4A	296 - 303	32

Appendix C: Requirements for Correcting Errors in the Electronically-Batch Filed Suspicious Activity Report by Money Services Business, FinCEN Form 109.

The Financial Crimes Enforcement Network (FinCEN) is issuing these guidelines to assist users of the Bank Secrecy Act (BSA) E-Filing System in correcting errors in batch-filed Suspicious Activity Reports by Money Services Business (SAR-MSB), FinCEN Form 109.

**Primary Errors:**

The following SAR-MSB errors are primary and must be corrected.

<b>Error Code</b>	<b>Error Description<sup>1</sup></b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
M02	"Reporting Business Name" is missing or invalid.	2A	4-58	35
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
M11	"Transaction Location Legal Name" is missing or invalid.	2B	10 - 64	24
M17	"Transaction Location EIN or SSN/ITIN (Individual)" is missing or invalid.	2B	208 - 216	30
M18	"Transaction Location Business Phone Number" value is missing or invalid.	2B	217 - 226	31
M29	"From Violation Date" is missing, invalid, or more recent than "Date Filed."	3A	13 - 20	16
M31	"Violation Amount Value" is missing or invalid.	3A	29 - 43	17
M33	"Category of Suspicious Activity" is missing, is invalid, or has duplicates.	3A	45 - 48	18

<sup>1</sup> 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 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.

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
M39	"Contact Telephone Number" is missing or invalid.	3A	169 - 178	46
M45	"Subject's Last Name or Entity Full Name" is missing.	4A	15 - 49	4
M53	"Subject's SSN/ITIN/EIN" is missing or invalid.	4A	223 - 231	13
M59	"Explanation/Description of the suspicious activity" is missing or contains one or more blank records.	7A	13 - 470	Part VI

### Secondary Errors:

The following SAR-MSB errors are secondary. They must be corrected only when there are primary errors in the same SAR-MSB.

<b>Error Code</b>	<b>Error Description<sup>2</sup></b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
M01	"Reporting Business same as Transaction Location Indicator" is checked but Reporting Business Name and Address information is not blank or "Reporting Business same as Transaction Location Indicator" is invalid.	2A	3	34
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
M10	"Type of Business Location" is invalid.	2B	9	23
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
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

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<sup>2</sup> Ibid.

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
M16	"Transaction Location Country" is missing or invalid.	2B	206 - 207	32
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
M30	"To Violation Date" is invalid, more recent than "Date Filed," or earlier than "From Date."	3A	21 - 28	16
M32	"Violation Amount Unknown" value is invalid.	3A	44	17a
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
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

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
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
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
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
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

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
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
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



<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
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

Appendix D: Requirements for Correcting Errors in Electronically-Batch Filed Suspicious Activity Reports by the Securities and Futures Industries, FinCEN Form 101.

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The Financial Crimes Enforcement Network (FinCEN) is issuing these guidelines to assist users of the Bank Secrecy Act (BSA) E-Filing System in correcting errors in batch-filed Suspicious Activity Reports by the Securities and Futures Industries (SAR-SF), FinCEN Form 101.

**Primary Errors:**

The following SAR-SF errors are primary and must be corrected.

<b>Error Code</b>	<b>Error Description<sup>1</sup></b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
R01	"Institution Name" is missing.	2A	3 – 37	36
R06	"Institution EIN" is missing or invalid.	2A	104 – 112	37
R18	"From Violation Date" is missing, invalid, or more recent than "Prepared Date."	3A	15 – 22	21
R20	"Total Dollar Amount" is missing or invalid.	3A	31 – 40	22
R25	"Violation Type" is missing, is invalid, or has duplicate entries.	3A	177 – 196	30
R34	"Contact Work Area Code" is missing or invalid.	3A	418 - 420	56
R35	"Contact Work Phone Number" is missing or invalid.	3A	421 - 427	56
R37	"Subject's Name" is missing or invalid.	4A	13 – 47	3-5
R44	"Subject's TIN" is missing or invalid.	4A	211 – 219	14
R63	"Explanation/Description" of the suspicious activity is missing or contains one or more blank records.	5A	13 - 510	Part VI

**Secondary Errors:**

The following SAR-SF errors are secondary. They must be corrected only when there are primary errors in the same SAR-SF.

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<sup>1</sup> 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 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.

<b>Error Code</b>	<b>Error Description<sup>2</sup></b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
R02	"Institution Address" is missing.	2A	38 – 67	38
R03	"Institution City" is missing.	2A	68 – 92	39
R04	"Institution State" is missing or invalid.	2A	93 – 94	40
R05	"Institution ZIP Code" is missing or invalid.	2A	95 – 103	41
R07	Transmitter Control Code is missing.	2A	113 – 120	
R08	"Central Registration Depository Number" is invalid.	2A	121 – 131	47
R09	"SEC ID Number" is invalid.	2A	132 – 140	48
R10	"National Futures Association ID Number" is invalid.	2A	141 – 148	49
R12	"Multiple Branches" is invalid.	2B	38	43
R14	"Branch Office State" is invalid.	2B	64 – 65	45
R15	"Branch Office ZIP Code" is invalid.	2B	66 – 74	46
R16	"Report Indicator" is missing or invalid.	3A	13	1
R17	"Multiple Subject or Subject Information Unavailable" is invalid.	3A	14	2a/b
R19	"To Violation Date" is invalid, earlier than the "From Violation Date," or more recent than "Prepared Date."	3A	23 – 30	21
R21	"Type of Instrument" is invalid or has duplicate entries.	3A	41 – 60	23
R22	"Commodity Type" is missing when "Type of Instrument" is 'Q'.	3A	61 – 80	23q
R23	"Instrument Description" is missing when "Type of Instrument" is 'R'.	3A	81 – 100	23r
R24	"Market Where Traded" is missing when "Type of Instrument" is 'S'.	3A	101 – 104	23s

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<sup>2</sup> Ibid.

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
R26	"Enforcement Agency Contacted" is invalid or has duplicate entries.	3A	197 - 214	31
R27	"Other Authority Contacted Or US Attorney Office" is missing when "Enforcement Agency Contacted" is B or L-R.	3A	215 – 249	32
R28	"Contact Phone Number" is invalid.	3A	285 – 294	34
R29	"Date Contacted" is invalid or more recent than "Date Prepared."	3A	295 – 302	35
R30	"Has Reporting Individual/ Entity Coordinated This Report With Another Individual/ Entity" is invalid.	3A	303	50
R31	"Type of Institution" is invalid or has duplicate entries.	3A	304 – 357	51
R32	"Contact for Assistance Name" is missing.	3A	358 - 392	52-54
R33	"Contact Title/Position" is missing.	3A	393 - 417	55
R36	"Prepared Date" is missing or invalid.	3A	428 - 435	57
R38	"Subject's Occupation" - no special characters allowed.	4A	83 –112	7
R39	"Subject's Address" is missing.	4A	113 - 142	8
R40	"Subject's City" is missing.	4A	143 - 167	9
R41	"Subject's State" is missing or invalid.	4A	168 - 169	10
R42	"Subject's ZIP Code" is missing or invalid.	4A	170 – 178	11
R43	"Subject's Country" is invalid.	4A	179 – 180	12
R45	"Subject Account Number 1" is missing.	4A	220 – 237	15
R46	"Subject Account Number 1 Closed" is invalid.	4A	238	15
R47	"Subject Account Number 2" is missing when "Subject Account Number 2 Closed" is "Y."	4A	239 – 256	15
R48	"Subject Account Number 2 Closed" is invalid.	4A	257	15

<b>Error Code</b>	<b>Error Description</b>	<b>Record</b>	<b>Field Position</b>	<b>Form Field Number</b>
R49	"Subject Account Number 3" is missing when "Subject Account Number 3 Closed" is "Y."	4A	258 – 275	15
R50	"Subject Account Number 3 Closed" is invalid.	4A	276	15
R51	"Subject Account Number 4" is missing when "Subject Account Number 4 Closed" is "Y."	4A	277 – 294	15
R52	"Subject Account Number 4 Closed" is invalid.	4A	295	15
R53	"Subject's Date of Birth" is invalid or more recent than the "Date Filed."	4A	296 – 303	16
R54	"Subject's ID" is missing or invalid.	4A	304	17
R55	"Subject's ID Other Description" is missing.	4A	305 – 344	17e
R56	"Subject's ID Number" is missing.	4A	345 – 366	17f
R57	"Subject's Issuing Authority" is missing or invalid.	4A	367 – 368	17g
R58	"Subject's Work Area Code" is invalid.	4A	369 – 371	18
R59	"Subject's Work Phone" is invalid.	4A	372 – 378	18
R60	"Subject's Area Code" is invalid.	4A	379 – 381	19
R61	"Subject's Phone Number" is invalid.	4A	382 – 388	19
R62	"Subject's Association" is invalid.	4A	389	20