



Financial Crimes Enforcement Network

FinCEN Suspicious Activity Report (FinCEN SAR) Electronic Filing Requirements

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DEPARTMENT OF THE TREASURY

Financial Crimes Enforcement Network (FinCEN)

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Revision History

Version Number	Date	Reason for Change
1.0	09/22/11	Removes step to rename BSA SAR batch attachment zip file to *.bsazip prior to submission (Attachment D – Batch Attachments).
1.1	03/22/12	<p>Updates electronic specification document title from “BSA Electronic Requirements for Bank Secrecy Act Suspicious Activity Report (BSA SAR)” to “FinCEN Suspicious Activity Report (FinCEN SAR) Electronic Filing Requirements” and replaces “BSA SAR” with “FinCEN SAR” through the document.</p> <p>Updates Part IV TIN (Item 80, 2A record, pos. 155-179) Description and Remarks to replace “less than” with “not equal to” in the following statement: “A TIN entry is also invalid if it is not equal to 9 numbers and Part IV TIN Type is “A” or “B.””</p> <p>Updates Part IV Financial Institution Identification Type (Item 84) Description and Remarks to include the full description for each identification type (e.g. “CRD number” changed to “Central Registration Depository (CRD) number”).</p> <p>Updates Part III Financial Institution Identification Type (Item 51) Description and Remarks to include the full description for each identification type (e.g. “CRD number” changed to “Central Registration Depository (CRD) number”).</p> <p>Updates Part III TIN (Item 55, 2B record, pos. 503-527) Description and Remarks to replace “less than” with “not equal to” in the following statement: “A TIN entry is also invalid if it is not equal to 9 numbers and Part III TIN Type is “A” or “B.””</p> <p>Updates Part III Branch or Office Country (Item 70, 2C record, pos. 176-177) Description and Remarks to make this field REQUIRED when a branch or office 2C record is recorded.</p> <p>Deletes “Attachment C – Field Editing Instructions” after incorporating the data in “Attachment D – Electronic Filing Instructions” as General Instructions “11. Prohibited Words and Phrases” and “12. Name Editing Instructions.” Changed “Attachment D” to “Attachment C” and “Attachment E” to “Attachment D” throughout the document as a result.</p> <p>Removes the option to enter an internal file number if correcting/ amending a prior report; updates Field Name/Description and Remarks (3A record, pos. 12-25), as well as Attachment C – Electronic Filing Instructions, to reflect this change to Item 1.</p> <p>Updates Field Name for Item 96 (3A record, pos. 1113-1122) and Item 97 (3A record, pos. 1123-1138 & 1139-1144), as well as Attachment C – Electronic Filing Instructions, to replace the word “Designated” with “Filing Institution,” and updates the Description and Remarks accordingly.</p>

Version Number	Date	Reason for Change
		<p>Updates TIN (Item 13, 3A record, pos. 304-328) Description and Remarks to replace “less than” with “not equal to” in the following statement: “A TIN entry is also invalid if it is not equal to 9 numbers and TIN Type is “A” or “B.””</p> <p>Updates Part I State Unknown (Item 10, 4B record, pos. 163) Description and Remarks to include the following: “If the subject’s state is unknown and Part I Country is “US,” “CA,” “MX,” or unknown, enter “X”. Otherwise space-fill.”</p> <p>Added the following clarifying language to the Error Codes Description and Remarks (Acknowledgement Transmitter (1A) Record, pos. 30-119): “...Error codes associated with this record begin with a “T,” are 3 alphanumeric characters in length, and are left-justified...”</p> <p>Removes error codes S253 and S254 from Attachment A – Error Code List.</p> <p>Updates error code S258 Error Description in Attachment A – Error Code List for clarification by removing validation that branch/office street address and branch/office country cannot both be blank and replaced with the following description: “Branch/office country is blank and Part III No Branch Activity (Item 65) is blank.”</p> <p>Updates error code S205, S238, and S416 in Attachment A – Error Code List to include the following explanation as to why the TIN entry is invalid: “...TIN is an invalid number string such as all zeros, all nines, 123456789, or a U.S. TIN and not nine digits.</p> <p>Updates General Instructions 6 (Supporting Documentation) of Attachment C – Electronic Filing Instructions, as well as Attachment D – Batch Attachments, to clarify that only comma separated (.CSV) files are the only form of acceptable attachments for FinCEN SAR reports.</p> <p>Updates Date of Birth (Item 16) instructions, located in Attachment C – Electronic Filing Instructions, to include language that explains how to enter dates on a discrete file vs. a batch file (i.e. MM/DD/CCYY for discrete files; MMDDCCYY for batch files).</p> <p>Updates Relationship of subject to an institution (Item 21) instructions, located in Attachment C – Electronic Filing Instructions, to include the following sentence at the end of the paragraph: “If more than one of 21h “Director,” 21i “Employee,” 21k “Officer,” or 21l “Owner or Controlling Shareholder” is selected and/or the status or action date is different for each, an Item 21 for each must be completed.”</p> <p>Updates “Item *27 Date or date range of suspicious activity for this report” instructions, located in Attachment C – Electronic Filing Instructions, to include the following sentence at the end of the paragraph: “Use the format MM/DD/CCYY for dates in a discrete FinCEN SAR and the format MMDDCCYY for dates in a batch-filed FinCEN SAR.”</p> <p>Updates “Item 53 Legal name of financial institution” instructions, located in Attachment C – Electronic Filing Instructions, to include the following statement: “...Enter the full name of the filer if the filer is an individual, such as a sole proprietorship, acting as a financial institution. If an</p>

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		<p>individual’s name is recorded, enter the name in (first name) (middle name) (last name) or equivalent format, e.g. John Jacob Doe or Richard R. Roe II, etc...”</p> <p>Updates Item 70 title, located in Attachment C – Electronic Filing Instructions, to include the following: “(* if 65a is NOT selected...”</p> <p>Updates “Item *79 Filer name” instructions, located in Attachment C – Electronic Filing Instructions, to include the following statement: “...Enter the full name of the filer if the filer is an individual, such as a sole proprietorship, acting as a financial institution. If an individual’s name is recorded, enter the name in (first name) (middle name) (last name) or equivalent format, e.g. John Jacob Doe or Richard R. Roe II, etc.”</p> <p>Updates error code F88 in Attachment A – Error Code List to remove the reference to “code” at the end of the error description. The updated description for F88 is now “The Transmitter Control Code (TCC) specified in the file is not a valid production TCC.”</p> <p>Removes reference to BSA E-Filing website for ISO information from the “Address” instructions located in Attachment C – Electronic Filing Instructions, as no such information is posted to the BSA E-Filing site at this time.</p> <p>Removes “alphanumeric” as an invalid form of entry for the Transmitter TIN in the 1A record, position 483-507.</p> <p>Replaced “Document Control Number” field within each acknowledgement record to now read “BSA Identifier.”</p> <p>Updates the location of the approved list of NAICS codes (Item 7) to http://bsaeiling.fincen.treas.gov/main.html. The change can be seen in the 4A record, position 298-303, as well as Attachment C – Electronic Filing Instructions.</p> <p>Updates field positions associated with the Filler (was 198-1210; now 198-1190) and User Field (was 1211-1220; now 1191-1200) in the 2C Record.</p> <p>Updated the Description and Remarks associated with the Subject ID Issuing State (Item 15) in the 4C record (position 33-35) to the following: “Enter the appropriate two or three character code when the identification was issued by a known state, province, or territory of the United States, Canada, or Mexico. See General Instruction 7 in Attachment C for information about the codes to be entered. Otherwise space-fill this field.”</p> <p>Adds the following lead sentence to the General Instructions “12. Name Editing Instructions” of Attachment C – Electronic Filing Instructions: “When recording the name of an individual, a filer should enter the last name/family name or equivalent in a last name field, the first name or equivalent in the first name field, middle name or equivalent in the middle name field, and name suffix (such as JR, SR, III, etc) in the suffix field whenever these fields are provided.”</p> <p>Updates the following FinCEN SAR Filing Instructions, located in Attachment C – Electronic Filing Instructions:</p>

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		<ul style="list-style-type: none"> • In “1. Who Must File” added “163.180,” to the 12 C.F.R. citations in the first sentence. In the second sentence changed Banks (31 CFR §1020.320);” to “Banks (31 CFR §1020.320) including Bank and Financial Holding Companies (12 CFR § 225.4);”. • In “4. Additional Filing Instructions for Banks” added “163.180,” to the 12 C.F.R. citations. <p>Updates the following General Instructions, located in the FinCEN SAR Electronic Filing Instructions section of Attachment C – Electronic Filing Instructions:</p> <ul style="list-style-type: none"> • In “2. Recording Information” added “even when the required data are unknown” to the end of the first sentence. Deleted “or not applicable” from the end of the second sentence. Inserted the following sentences between the second and third sentences: “Items that do not begin with an asterisk must be completed if the data are known and will be left blank if the data are unknown. If an item’s instructions differ from this general instruction, the item instructions must be followed.” Changed “data is unknown” to “data are unknown” in the second to last sentence. • In “3. Corrected/Amended Reports” inserted “or prior SAR versions” after “FinCEN SAR” in the first and second sentences. Added the following sentence to the end of the instruction: “BSAIDs, which replaced DCNs, are provided in acknowledgement records sent to member financial institutions by the BSA E-Filing System.” • In “6. Supporting Documentation” added “(31 CFR § 1010.430)” to the end of the sixth sentence that references retention of supporting documents for 5 years. <p>Updates the following Item Instructions, located in the FinCEN SAR Electronic Filing Instructions section of Attachment C – Electronic Filing Instructions:</p> <ul style="list-style-type: none"> • In “16. Date of birth” changed all references to “15” to “16.” • In “24. Financial institution TIN...” added “If the TIN is unknown leave the TIN field blank” following the sixth sentence. Changed the start of sentence “When there are multiple Part III institutions recorded in the FinCEN SAR and the TIN of the financial institution associated with account numbers is unknown,” to read “If the TIN of a financial institution associated with an account number entered in 24d is unknown,”. • In “28 Cumulative amount...” added “, including the current FinCEN SAR.” to the end of the second sentence. • In the introductory paragraph for Part III, changed the fourth sentence to read: “If a financial institution recorded in Part III has branches involved in the suspicious activity, record the branch information in Items 64 through 70. Information on up to 99 branches can be recorded in a single SAR.” Deleted the sentence “Do not provide separate Part III records on branches.” • In “52. Financial institution’s role...” changed the instruction to read as follows: “Check box 52a “Selling location” if the customer purchased at the Part III financial institution the products or

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		<p>instruments recorded in Items 39 or 40. Check box 52b "Paying location" if the customer received payment from the Part III financial institution for the products or instruments recorded in Items 39 or 40. Check box 52c "Both" if the Part III financial institution was both a paying and selling location for the products or instruments recorded in Items 39 or 40."</p> <ul style="list-style-type: none"> • In "62. Internal control/file number" inserted ", if applicable," after "file number" in the first sentence. • In "64. Branch's role in transaction" changed the instructions to read: "Check box 64a "Selling location" if the customer purchased at the Part III financial institution branch the products or instruments recorded in Items 39 or 40. Check box 64b "Paying location" if the customer received payment from the Part III financial institution branch for the products or instruments recorded in Items 39 or 40. Check box 64c "Both" if the Part III financial institution branch was both a paying and selling location for the products or instruments recorded in Items 39 or 40. This item must be blank if no branch is involved in the suspicious activity. If multiple branches are involved in the suspicious activity, a separate Item 64 must be prepared for each branch." • In "92. LE contact agency" added the following note to the instructions. "NOTE: If more than one LE agency has been contacted about the suspicious activity, record the information on one agency in Items 92-95 and the information on additional agencies in Part V." • In Part V changed the third bullet to read as follows. "If any item in the report was insufficient for recording all item data held by the filer, or if an item's instructions require entry of additional data or explanation in the narrative, record the additional data referenced by item number in the narrative. • In Part V deleted the bullet that begins "Recommend any further investigation...."
1.2	09/19/12	<p>General Updates</p> <ul style="list-style-type: none"> • FinCEN SAR "report" Replaces the reference to the FinCEN SAR as a "form" with "report" throughout the document. • Acknowledgement File Format Updates the acknowledgement file format to include User Field values from incoming records. <p>Updates to File Organization:</p> <ul style="list-style-type: none"> • Financial Institution Where Activity Occurred (2B) Record Replaces the statement "...for each financial institution reporting under the Filing Institution (2A) Record" with "under the Filing Institution Information (2A) Record for each financial institution where the suspicious activity occurred." Also removes the reference to "suspicious activity report" from the end of the second sentence and replaces it with "FinCEN SAR." • Subject (4A) Record

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		<p>Removes the statement “or joint filing.”</p> <p>Updates to Record Layouts:</p> <ul style="list-style-type: none"> • Transmitter ZIP/Postal Code (as well as Items 11/60/69/88) Updates the Description and Remarks to include “or four nines” in the following sentence: “A nine-digit entry cannot end with four zeros or four nines ...” • Part IV Filer Name (Item 79) Updates the Description and Remarks to replace the statement “Enter the complete name of the filing institution” with “Enter the legal name of the filing institution as recorded on articles of incorporation or other documents establishing the institution.” • Part IV Type of Securities and Futures Institution – Other (Item 50/83) Updates the Description and Remarks to replace “is” with “contains” in the following sentence: “If the “Securities and Futures Institution Type” contains “Z,” enter a brief...” • Part III TIN Type (Item 56) Updates the Description and Remarks to replace the statement “...follow form instructions for determining the TIN type code to enter” with “...follow the Item 56 instructions in Attachment C to determine the TIN Type code to enter.” • Part III Loss to Financial Institution (Item 63) Updates the Description and Remarks to include the following: “See the Item 63 instructions in Attachment C for further information on entering amounts in this item.” Attachment C Item 63 instructions now includes the statement “The amount entered in this field cannot be zero and cannot be greater than the amount in Item 26 “Amount involved in this report.”” • Prior Report Document Control Number/ BSA Identifier (Item 1) Updates the Description and Remarks to include the following: “If the DCN or BSA ID is unknown, enter zeros in place of the unknown number.” • Amount Involved In This Report (Item 26) Updates the Description and Remarks to replace the statement “Zero is not an amount” with “Zero is not an amount, so the entry “0” for the amount involved is NOT permitted in this item.” • Cumulative Amount (Item 28) Updates the Description and Remarks to include the following: “See the Item 28 instructions in Attachment C for additional information on entering amounts in this field.” • Structuring (Item 29) (as well as Items: 30-39) Updates the Description and Remarks to replace the instruction to “Left justify and zero-fill” with “Left justify and space-fill.” • Instrument Type(s)/Payment Mechanism(s) Involved (Item 40) Updates the Description and Remarks to include the following: “Left justify and space-fill the entry. Do not include spaces between multiple entries.” • CUSIP Number (Item 45) Updates the Description and Remarks to the following: “Enter the

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		<p>CUSIP Number of any securities product involved in the suspicious activity. Left justify and space-fill this entry.”</p> <ul style="list-style-type: none"> • First Name (Item 4) Updates the Description and Remarks to replace the statement “Space-fill if “First Name Unknown” contains “X”” with “Space-fill if “First Name Unknown” contains “X,” “If Entity” contains “A,” or “If All Critical* Subject Information Is Unavailable” contains “B.”” • NAICS Code (Item 7) Updates the Description and Remarks to replace the statement “Access the NAICS Code like from...” with “Use only the codes from the NAICS Code list found on...” Also adds the following statement: “Use of codes not found on that list is prohibited.” • Relationship of the Subject to an Institution (Item 21) Updates the Field Name to replace the name “Relationship of the Subject to an Institution” with “Institution TIN” for field positions 8-32 of the Subject Relationship to Institution (4H) Record <p>Updates to Attachment B – Error Correction Instructions:</p> <ul style="list-style-type: none"> • Error Categories Replaces the statement “fatal errors that result” with “format errors that may result”. • Correction Procedures Updates the third bullet to include “file” in the following statement: “Enter the prior report’s BSA Identifier from the FinCEN SAR acknowledgement file at Field Position 12-25 “Prior Report Document Control/File Number” in the Suspicious Activity Information (3A) Record for each corrected FinCEN SAR.” <p>Updates to Attachment C – Electronic Filing Instructions:</p> <ul style="list-style-type: none"> • FinCEN SAR Filing Instructions (1. Who must file) Adds Residential Mortgage Lenders and Originators to the list of financial institutions required to file a FinCEN SAR. As a result, includes “and Residential Mortgage Lenders and Originators (31 CFR § 1029.320)” at the end of the instructions. • FinCEN SAR Filing Instructions (7. Additional Reporting) Adds the following statement to the end of the instructions: “Residential Mortgage Lenders and Originators are required to file Form 8300, Report of Cash Payments Over \$10,000 Received in a Trade or Business, instead of a CTR.” • General Instructions (3. Corrected/Amended Reports) Updates “3. Corrected/Amended Reports” to include the statement “If the prior report’s DCN or BSA ID is unknown, field 1e should be zero-filled.” • General Instructions (12. Name Editing Instructions) Updates “12. Name Editing Instructions” to match the instructions in the FinCEN CTR and DOEP. • Item Instructions (Item *1 Type of Filing) Updates “Item 1 Type of Filing” to include the statement “If the DCN or BSA ID is unknown, enter zeros in place of the unknown number.” • Item Instructions (Item 4. First name)

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		<p>Updates "Item *4 First name" to include "2a or" in the following statement: "Leave Item 4 and box 4 "Unknown" blank if box 2a or 2b is checked."</p> <ul style="list-style-type: none"> • Item Instructions (Items: 19. E-mail address, 19a. Website (URL) address) Removes the statements "Multiple Item 19 fields may be completed if multiple e-mail address for the subject are known" and "Multiple Item 19a fields may be completed if multiple website address for the subject are known" from the item instructions for these items. Those options were stated in the instructions twice. • Item Instructions (Item 47. Type of financial institution) Updates "Item 47 Type of financial institution" to replace the following with what is listed now: "Record the type of financial institution entered in Part III by selecting the appropriate option in Item 47. If none of options 47a through 47e are appropriate, select option 47z "Other" and enter a brief description of the type of financial institution in the associated text field. If necessary, include a more detailed description in Part V. If option 47a Casino/Card Club is selected, then Item 49 for type of gaming institution must be completed. If option 47e Securities/Futures is selected, then Item 50 for type of securities and futures institution must be completed." See updated instructions in Attachment C. • Item Instructions (Item 82. Type of financial institution) Updates "Item 82 Type of financial institution" to include the following note: "NOTE: If the financial institution is a non-bank residential mortgage lender or originator, select "Other" and enter "NON-BANK RESEDENTIAL MORTGAGE" in the associated text field. If the financial institution is a dealer in precious metals, stones, or jewels, select option "Other" and enter "DEALER IN PRECIOUS METALS STONES JEWELS" in the associated text field." <p>Updates to Attachment D – Batch Attachments:</p> <ul style="list-style-type: none"> • Secure Data Transfer Mode Users Updates the instructions to include naming convention and attachment file structure information related to SDTM/System to System filers.
1.3	09/27/14	<p>Updates to Record Layouts</p> <ul style="list-style-type: none"> • Filing Institution Information (2A) Record: <ul style="list-style-type: none"> ○ Added "Federal Housing Finance Agency (FHFA)" to Part IV Primary Federal Regulator (Item 78). ○ Added "Loan or Finance Company" and "Housing GSE" to Part IV Type of Financial Institution (Item 82). ○ Added "National Association of Insurance Commissioners (NAIC Code)" and "Mortgage (NMLS ID)" to Part IV Financial Institution Identification Type (Item 84). • Financial Institution Where Activity Occurred (2B) Record: <ul style="list-style-type: none"> ○ Added "Loan or Finance Company" and "Housing GSE" to Part

Version Number	Date	Reason for Change
		<p>III Type of Financial Institution (Item 47).</p> <ul style="list-style-type: none"> ○ Added “Federal Housing Finance Agency (FHFA)” to Part III Primary Federal Regulator (Item 48). ○ Added “National Association of Insurance Commissioners (NAIC Code)” and “Mortgage (NMLS ID)” to Part III Financial Institution Identification Type (Item 51). <p>Updates to Attachment C – Electronic Filing Instructions</p> <ul style="list-style-type: none"> • General Instructions (7. Addresses): <ul style="list-style-type: none"> ○ Removed “Note: The ISO 3166-1 country list includes entries for all U.S. territories. Do not use these U.S. territory entries, which match the U.S. Postal Service abbreviations required in state fields, in any country field.” Added “Note: The ISO 3166-1 country list contains entries for all U.S. territories, including the United States Minor Outlying Islands. Do not use these U.S. territory entries, which may match the U.S. Postal Service abbreviations required in state fields, in any country field.” • Item Instructions: <ul style="list-style-type: none"> ○ Updated the following items to correspond with the field entry additions in the 2A and 2B records mentioned above: 47, 48, 51, 78, 82, and 84. <p>Updates to Attachment D – Batch Attachments</p> <ul style="list-style-type: none"> • Added the following instructions: <p>“NOTE: Please be advised that when entering data into an Excel spreadsheet prior to saving it as a comma separated (.CSV) file, the default behavior for numeric data entered into cells is to convert numeric values over 11 characters into scientific notation. For example, the value of 123456789123 is converted to 1.23457E+11 after entry. When the Excel spreadsheet is saved to a comma separated (.CSV) fill, this visible format is retained and when opened the entire original number is not displayed, 123456789123, but rather 1.23457E+11. To avoid this behavior, please ensure that your workbook cells are formatted as text prior to entering data in the cell. This can be accomplished by selecting the column, right clicking the mouse and selecting Format Cells, and then selecting Text under Category, and then OK. This must be done before entering the data, not after.”</p>

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1.4	03/15/2015	<p>Updates to Attachment C – Electronic Filing Instructions</p> <ul style="list-style-type: none"> • General Instructions (7. Addresses): <p>Removed “Note: The ISO 3166-1 country list contains entries for all U.S. territories, including the United States Minor Outlying Islands. Do not use these U.S. territory entries, which may match the U.S. Postal Service abbreviations required in state fields, in any country field.”</p> <p>This change was made as the discrete (online) reports were updated to include the following entries in Country fields:</p> <p>American Samoa, (AS) Guam, (GU) Marshall Islands (the), (MH) Micronesia (the Federated States of), (FM) Northern Mariana Islands (the), (MP) Palau, (PW) Puerto Rico, (PR) Virgin Islands (U.S.), (VI)</p> <p>These values can now be used in Country fields to adhere to the ISO 3166-1 standard.</p> <p>Updates to Item 9 in General Instructions</p> <p>Changed last sentence in instruction</p> <p>From:</p> <ul style="list-style-type: none"> • Such numbers include alien registration, CRD, CUSIP®, driver’s license, state identification, EIN, IARD, ITIN, passport, RSSD, SEC ID, and SSN. <p>To:</p> <ul style="list-style-type: none"> • Such numbers include account numbers, alien registration numbers, CRD, CUSIP®, driver’s license numbers, state identifications, EINs, IARDs ITINs, passport numbers, RSSDs, SEC IDs, and SSNs. <p>Updates to Item 24 in General Instructions</p> <p>Added the following sentence:</p> <ul style="list-style-type: none"> • Enter account numbers without formatting or special characters such as spaces, hyphens, or periods. <p>Addition of a new Attachment E – Batch File Layout Examples</p> <ul style="list-style-type: none"> • This new section provides additional instruction on the layout of the batch files along with examples.

Purpose

The purpose of this document is to provide the requirements and conditions for electronically filing the FinCEN Suspicious Activity Report (FinCEN SAR). 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. If the General Specifications conflict with any specific requirement found in this document, the specific requirement should be followed. Additional instructions concerning the data to be entered in the electronic file are found in Attachment C – Electronic Filing Instructions.

Electronic Filing

The BSA E-Filing System Batch File Testing Procedures are detailed in a separate document that can be accessed on the BSA E-Filing System web site at <http://bsaefiling.fincen.treas.gov> under Quick Links. For purposes of this document, the filer is the organization responsible for filing the FinCEN SAR 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 FinCEN SAR data and all original supporting documentation or business record equivalent for five years from the date of the suspicious activity report. All supporting documentation must be made available to appropriate authorities upon request.

File Organization

The following data controls must be followed or the FinCEN SAR 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.

Filing Institution Information (2A) Record – Required

There must be one of this record type for each Filing Institution on the file. This record type immediately precedes all records related to the filing institution identified in Part IV. The 2A record may be associated with multiple FinCEN SARs.

Financial Institution Where Activity Occurred (2B) Record – Required

There must be at least one of this record type under the Filing Institution Information (2A) Record for each financial institution where the suspicious activity occurred. This record type precedes all records related to the financial institution(s) identified in Part III for a particular FinCEN SAR. Filers are permitted to associate up to 99 2B records for a single FinCEN SAR. Multiple 2B records for a single FinCEN SAR must occur prior to the associated Suspicious Activity Information (3A) Record.

Branch or Office Institution Where Activity Occurred (2C) Record

There can be one or more of this record type when one or more branches or offices are involved in the suspicious activity. Filers are permitted to associate up to 99 2C records for each Financial Institution Where Activity Occurred (2B) Record on the file. All 2C records must be grouped under the associated 2B record.

Suspicious Activity Information (3A) Record – Required

There can only be one of this record type for each suspicious activity or joint filing being reported for the financial institution(s) identified in the associated 2B record(s). Filers are NOT permitted to associate multiple Suspicious Activity Information (3A) Records under one or more shared 2B/2C records.

Commodity Type (3B) Record

There can be more than one of this record type depending on the number of different commodity types associated with a suspicious activity reported on the file. Filers are permitted to associate up to 99 3B records for each Suspicious Activity Information (3A) Record on the file.

Product/Instrument Description (3C) Record

There can be more than one of this record type depending on the number of different product/instrument descriptions associated with a suspicious activity reported on the file. Filers are permitted to associate up to 99 3C records for each Suspicious Activity Information (3A) Record on the file.

Market Where Traded (3D) Record

There can be more than one of this record type depending on the number of different markets where traded associated with a suspicious activity reported on the file. Filers are permitted to associate up to 99 3D records for each Suspicious Activity Information (3A) Record on the file.

IP Address (3E) Record

There can be more than one of this record type depending on the number of different IP addresses associated with a suspicious activity reported on the file. Filers are permitted to associate up to 99 3E records for each Suspicious Activity Information (3A) Record on the file.

CUSIP Number (3F) Record

There can be more than one of this record type depending on the number of different CUSIP numbers associated with a suspicious activity reported on the file. Filers are permitted to associate up to 99 3F records for each Suspicious Activity Information (3A) Record on the file.

Subject (4A) Record – Required

There must be one of this record type for each subject involved in the suspicious activity. Filers are permitted to associate up to 999 4A records for each Suspicious Activity Information (3A) Record on the file.

Subject Address (4B) Record

There can be more than one of this record type depending on the number of different addresses associated with a subject reported on the file. Filers are permitted to associate up to 99 4B records for each Subject (4A) Record on the file. All 4B records for a particular subject must be grouped under the associated Subject (4A) Record.

Subject Identification (4C) Record

There can be more than one of this record type depending on the number of different forms of identification associated with a subject reported on the file. Filers are permitted to associate up to 99 4C records for each Subject (4A) Record on the file. All 4C records for a particular subject must be grouped under the associated Subject (4A) Record.

Subject Alternative Name (4D) Record

There can be more than one of this record type depending on the number of different alternative names associated with a subject reported on the file. Filers are permitted to associate up to 99 4D records for each Subject (4A) Record on the file. All 4D records for a particular subject must be grouped under the associated Subject (4A) Record.

Subject Telephone Number (4E) Record

There can be more than one of this record type depending on the number of different telephone numbers associated with a subject reported on the file. Filers are permitted to associate up to 99 4E records for each Subject (4A) Record on the file. All 4E records for a particular subject must be grouped under the associated Subject (4A) Record.

Subject E-mail Address (4F) Record

There can be more than one of this record type depending on the number of different e-mail addresses associated with a subject reported on the file. Filers are permitted to associate up to 99 4F records for each Subject (4A) Record on the file. All 4F records for a particular subject must be grouped under the associated Subject (4A) Record.

Subject Website (URL) Address (4G) Record

There can be more than one of this record type depending on the number of different website (URL) addresses associated with a subject reported on the file. Filers are permitted to associate up to 99 4G records for each Subject (4A) Record on the file. All 4G records for a particular subject must be grouped under the associated Subject (4A) Record.

Subject Relationship to Institution (4H) Record

There can be more than one of this record type depending on the number of different institution relationships associated with a subject reported on the file. Filers are permitted to associate up to 99 4H records for each Subject (4A) Record on the file. All 4H records for a particular subject must be grouped under the associated Subject (4A) Record.

Affected TIN & Account Number (4I) Record

There can be more than one of this record type depending on the number of different affected institution TINs and/or account numbers associated with a subject reported on the file. Filers are permitted to associate up to 99 4I records for each Subject (4A) Record on the file. All 4I records for a particular subject must be grouped under the associated Subject (4A) Record.

Narrative Description (5A) Record – Required

There can be more than one of this record type depending on the length of the narrative description given for the suspicious activity on the file. A maximum of 20 5A records may be associated with a Suspicious Activity Information (3A) Record.

Suspicious Activity Information Summary (9A) Record – Required

There must be one 9A record for each Suspicious Activity Information (3A) Record reported and it must follow the last Narrative Description (5A) Record for the associated FinCEN SAR.

Filing Institution Summary (9B) Record – Required

There must be one of this record type for each Filing Institution Information (2A) Record on the file and it must be the last record associated with the filing institution.

File Summary (9Z) Record – Required

There must be one of this record type on the file and it must be the last record.

Record Layouts

Transmitter (1A) Record – Required

The first record on each file must be the Transmitter (1A) Record, which will contain information identifying the batch file transmitter (person or organization handling the data accumulation and formatting). There will be only one transmitter record on each electronic file. All data elements for this record are required.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "1A."
3-152	Transmitter Name	150	REQUIRED. Enter the full name of the individual or organization that is transmitting the reports in this file. Left justify and space-fill the entry.
153-252	Transmitter Address	100	REQUIRED. Enter the street address of the transmitter. Left justify and space-fill the entry.
253-302	Transmitter City	50	REQUIRED. Enter the city of the transmitter. Left justify and space-fill the entry.
303-305	Transmitter State	3	REQUIRED. Enter the state code of the transmitter if the Transmitter Country code is CA, MX, or US. See General Instruction 7 in Attachment C for information about the codes to be entered. Space-fill if no entry.
306-314	Transmitter ZIP/Postal Code	9	REQUIRED. Enter the ZIP Code or foreign postal code for the transmitter. Do not include punctuation or formatting such as hyphens, periods, and spaces within the entry. An entry must be five or nine digits if the "Transmitter Country" is "US." A nine-digit entry cannot end with four zeros or four nines if "Transmitter Country" is "US." Left justify and space-fill this entry if less than nine digits.
315-316	Transmitter Country	2	REQUIRED. Enter the transmitter country code. See General Instruction 7 in Attachment C for information about the codes to be entered.
317-332	Transmitter Telephone Number	16	REQUIRED. Enter the transmitter telephone number. Enter all numbers as a single number string without formatting and punctuation such as spaces, hyphens, or parenthesis. Left justify and space-fill the entry.
333-482	Transmitter Contact Name	150	REQUIRED. Enter the name of an official contact for the transmitter. Left justify and space-fill the entry.

Field Position(s)	Field Name	Length	Description and Remarks
483-507	Transmitter Taxpayer Identification Number (TIN)	25	REQUIRED. Enter the U.S. or foreign Taxpayer Identification Number (TIN) assigned to the transmitter. Do not enter hyphens, slashes, or invalid entries such as all nines, all zeros, or "123456789". Left justify and space-fill the entry.
508-515	Coverage Beginning Date	8	REQUIRED. Enter the date of the earliest original transaction on the file. Enter as a numeric 8-position entry in the format MMDDCCYY where MM = month, DD = day, CC = century, and YY = year.
516-523	Coverage Ending Date	8	REQUIRED. Enter the date of the latest original transaction on the file. Enter as a numeric 8-position entry in the format MMDDCCYY where MM = month, DD = day, CC = century, and YY = year.
524-531	Transmitter Control Code (TCC)	8	REQUIRED. Enter the assigned 8-character production Transmitter Control Code (TCC). Do not enter a TCC assigned for testing purposes.
532-534	Batch Sequence Number (BSN)	3	Space-fill this field, which is reserved for BSA E-Filing use.
535-1186	Filler	652	Space-filled.
1187-1190	Format Indicator	4	Space-fill this field, which is reserved for BSA E-Filing use.
1191-1200	User Field	10	Use this field for any descriptive information you may require; otherwise space-fill this field.

Filing Institution Information (2A) Record – Required

This record identifies information regarding the filing institution. The number of 2A records will depend on the number of different filing institutions that are included on the file. The 2A record item numbers refer to the FinCEN SAR Part IV Items 78 - 91.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2A."
3-4	Part IV Primary Federal Regulator (Item 78)	2	REQUIRED. Enter the filing institution's "Primary Federal Regulator" code for the federal regulator or BSA examiner with primary responsibility for monitoring the filing institution's Bank Secrecy Act compliance. Filing institutions which are government agencies or which are financial institutions not subject to U.S. law should enter "Z" for not applicable. Left justify and space-fill this entry. <u>Code</u> <u>Regulator/Examiner</u> A Commodities Futures Trading Commission (CFTC) B Federal Reserve Board (FRB) C Federal Deposit Insurance Corporation (FDIC) D Internal Revenue Service (IRS) E National Credit Union Administration (NCUA) F Office of the Comptroller of the Currency (OCC) G Securities and Exchange Commission (SEC) H Federal Housing Finance Agency (FHFA) Z Not Applicable.
5-154	Part IV Filer Name (Item 79)	150	REQUIRED. Enter the legal name of the filing institution as recorded on articles of incorporation or other documents establishing the institution. Left justify and space-fill the entry.
155-179	Part IV TIN (Item 80)	25	REQUIRED. Enter the U.S. or foreign Taxpayer Identification Number (TIN) assigned to the filing institution. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789". A TIN entry is also invalid if it is not equal to nine numbers and Part IV TIN Type is "A" or "B." Left justify and space-fill the entry.
180	Part IV TIN Type (Item 81)	1	REQUIRED. Enter the filing institution TIN type as follows: <u>Code</u> <u>Description</u> A EIN B SSN/ITIN C Foreign

Field Position(s)	Field Name	Length	Description and Remarks
181	Part IV Type of Financial Institution (Item 82)	1	REQUIRED. Enter the code that describes the filing institution. If 'Z' is entered, a brief description of the institution type must be entered in "Type of Financial Institution Other." <u>Code</u> <u>Description</u> A Casino/Card Club B Depository institution C Insurance company D MSB E Securities/Futures F Loan or Finance Company G Housing GSE Z Other
182-231	Part IV Type of Financial Institution - Other (Item 82)	50	REQUIRED (conditional). If "Type of Financial Institution" is "Z," describe the type. Left justify and space-fill the entry. Otherwise space-fill this field.
232-244	Part IV Type of Securities and Futures Institution (Item 83)	13	REQUIRED (conditional). If "Type of Institution" is "E," enter all codes that describe the institution. Left justify and space-fill the entry. DO NOT enter spaces between multiple entries. Otherwise space-fill this field. <u>Code</u> <u>Description</u> A Clearing broker-securities B CPO/CTA C Futures Commission Merchant D Holding company E Introducing broker-commodities F Introducing broker-securities G Investment Adviser H Investment company I Retail foreign exchange dealer J SRO Futures K SRO Securities L Subsidiary of financial/bank holding company Z Other
245-294	Part IV Type of Securities and Futures Institution - Other (Item 83)	50	REQUIRED (conditional). If "Securities and Futures Institution Type" contains "Z," enter a brief description left justified and space-filled. Otherwise space-fill this field.

Field Position(s)	Field Name	Length	Description and Remarks
295	Part IV Financial Institution Identification Type (Item 84)	1	Enter the "Financial Institution Identification Type" code from the following list. Space-fill if no entry. <u>Code</u> <u>Description</u> A Central Registration Depository (CRD) number B Investment Advisor Registration Depository (IARD) number C National Futures Association (NFA) number D Research, Statistics, Supervision, and Discount (RSSD) number E Securities and Exchange Commission (SEC) number F National Association of Insurance Commissioners (NAIC Code) G Mortgage (NMLS ID)
296-315	Part IV Financial Institution Identification Number (Item 84)	20	REQUIRED (conditional). Enter the filing institution's identification number if a code was entered in "Financial Institution Identification Type." Left justify and space-fill this entry. Otherwise space-fill the field.
316-415	Part IV Address (Item 85)	100	REQUIRED. Enter the filing institution street address or equivalent. Left justify and space-fill the entry.
416-465	Part IV City (Item 86)	50	REQUIRED. Enter the filing institution city. Left justify and space-fill the entry.
466-468	Part IV State (Item 87)	3	REQUIRED (conditional). Enter the filing institution state code if the "Part IV Country" entry is "CA," "MX," or "US." See General Instruction 7 in Attachment C for information about the codes to be entered. Left justify and space-fill the entry. Otherwise space-fill this field.
469-477	Part IV ZIP/Postal Code (Item 88)	9	REQUIRED. Enter the filing institution ZIP Code or foreign postal code. Do not include punctuation or formatting such as hyphens, periods, and spaces within the entry. An entry must be five or nine digits if the "Part IV Country" entry is "US." A nine-digit entry cannot end with four zeros or four nines if the "Part IV Country" entry is "US." Left justify and space-fill the entry if less than nine characters.
478-479	Part IV Country (Item 89)	2	REQUIRED. Enter the filing institution country code. See General Instruction 7 in Attachment C for information about the codes to be entered.
480-629	Part IV Alternate Name (Item 90)	150	Enter the filing institution's alternate name (e.g., AKA - individual or trade name, DBA - entity). Do not include "AKA" or "DBA" with the entry. Left justify and space-fill the entry. Space-fill if no entry.

Field Position(s)	Field Name	Length	Description and Remarks
630-1190	Filler	561	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Financial Institution Where Activity Occurred (2B) Record – Required

This record identifies information regarding the financial institution where the suspicious activity occurred. The number of 2B records will depend on the number of different financial institutions involved in each FinCEN SAR reported on the file. The 2B record item numbers refer to the FinCEN SAR Part III, Items 47-63 and the “if no branch activity” box in Item 65.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2B."
3-12	Financial Institution Location Code	10	REQUIRED. Enter a unique numeric code for the different financial institution locations involved with FinCEN SARs. Right justify and zero-fill the entry.
13	Part III Type of Financial Institution (Item 47)	1	REQUIRED. Enter the financial institution type code from the following list. <u>Code</u> <u>Description</u> A Casino/Card Club B Depository institution C Insurance company D MSB E Securities/Futures F Loan or Finance Company G Housing GSE Z Other
14-63	Part III Type of Financial Institution - Other Description (Item 47)	50	REQUIRED (conditional). If the "Type of Financial Institution" is "Z", briefly describe the type. Left justify and space-fill the entry. Space-fill if no entry.

Field Position(s)	Field Name	Length	Description and Remarks
64-65	Part III Primary Federal Regulator (Item 48)	2	<p>REQUIRED. Enter the financial institution Primary Federal Regulator code for the federal regulator or BSA examiner with primary responsibility for monitoring the financial institution's Bank Secrecy Act compliance. Enter "Z" for not applicable if the financial institution is a foreign financial institution not subject to U.S. law. Left justify and space-fill the entry.</p> <p><u>Code</u> <u>Regulator/Examiner</u></p> <p>A Commodities Futures Trading Commission (CFTC) B Federal Reserve Board (FRB) C Federal Deposit Insurance Corporation (FDIC) D Internal Revenue Service (IRS) E National Credit Union Administration (NCUA) F Office of the Comptroller of the Currency (OCC) G Securities and Exchange Commission (SEC) H Federal Housing Finance Agency (FHFA) Z Not Applicable.</p>
66	Part III Type of Gaming Institution (Item 49)	1	<p>REQUIRED (conditional). If the "Type of Financial Institution" is "A - Casino/Card Club" enter the gaming institution type code from the following list, Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A State licensed casino B Tribal authorized casino C Card club Z Other</p>
67-69	Filler	3	Space-filled for future use.
70-119	Part III Type of Gaming Institution - Other (Item 49)	50	<p>REQUIRED (conditional). If the "Type of Gaming Institution" is "Z," enter a brief description, left justified and space-filled. Space-fill if no entry.</p>
120-129	Part III Type of Securities and Futures Institution (Item 50)	10	<p>REQUIRED (conditional). If the "Type of Financial Institution" is "E - Securities/Futures," enter the securities and futures type code(s) from the following list. Enter all codes that apply, left justified and space-filled. DO NOT enter spaces between multiple entries. Space-fill if no entries.</p> <p><u>Code</u> <u>Description</u></p> <p>A Clearing broker-securities B Futures Commission Merchant C Holding company D Introducing broker-commodities E Introducing broker-securities F Investment Adviser G Investment company H Retail foreign exchange dealer I Subsidiary of financial/bank holding company Z Other</p>

Field Position(s)	Field Name	Length	Description and Remarks
130-179	Securities and Futures Institution Type - Other Description (Item 50)	50	REQUIRED (conditional). If the "Type of Securities and Futures Institution" contains "Z," briefly describe the type, left justified and space-filled. Space-fill if no entry.
180	Part III Financial Institution Identification Type (Item 51)	1	Enter the "Financial Institution Identification Type" code from the following list. Space-fill if no entry. <u>Code</u> <u>Description</u> A Central Registration Depository (CRD) number B Investment Advisor Registration Depository (IARD) number C National Futures Association (NFA) number D Research, Statistics, Supervision, and Discount (RSSD) number E Securities and Exchange Commission (SEC) number F National Association of Insurance Commissioners (NAIC Code) G Mortgage (NMLS ID)
181-200	Part III Financial Institution Identification Number (Item 51)	20	REQUIRED (conditional). Enter the financial institution's identification number if a code was entered in "Financial Institution Identification Type." left justified and space-filled. Space-fill of no entry.
201	Part III Financial Institution's Role in Transaction (Item 52)	1	Enter the code that describes the financial institution role in the transaction. Space-fill if no entry. <u>Code</u> <u>Description</u> A Selling location B Paying location C Both a & b
202-351	Part III Legal Name of Financial Institution (Item 53)	150	REQUIRED (conditional). Enter the financial institution's legal name, left justified and space-filled. Space-fill if "Part III Legal Name of Financial Institution Unknown" contains "X."
352	Part III Legal Name of Financial Institution Unknown (Item 53)	1	If the legal name of the financial institution is unknown, enter "X". Otherwise space-fill this field.
353-502	Part III Alternate Name (Item 54)	150	Enter the financial institution's alternate name, left justified and space-filled. Space-fill if no entry.

Field Position(s)	Field Name	Length	Description and Remarks
503-527	Part III TIN (Item 55)	25	REQUIRED (conditional). Enter the financial institution's U.S. or foreign Taxpayer Identification Number (TIN). Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789." A TIN entry is also invalid if it is not equal to nine numbers and Part III TIN Type is "A" or "B." Left justify and space-fill the entry. Space-fill if Part III TIN Unknown" contains "X."
528	Part III TIN Unknown (Item 55)	1	If the financial institution's TIN is unknown, enter "X." Otherwise space-fill this field.
529	Part III TIN Type (Item 56)	1	REQUIRED (conditional). Enter the code for the financial institution's TIN type if "Part III TIN" contains an entry. Space-fill if "Part III TIN Unknown" contains "X." If a TIN has been entered but the TIN type is unknown, follow the Item 56 instructions in Attachment C to determine the TIN Type code to enter. <u>Code</u> <u>Description</u> A EIN B SSN/ITIN C Foreign
530-629	Part III Address (Item 57)	100	REQUIRED (conditional). Enter the financial institution's street address, left justified and space-filled. Space-fill if "Part III Address Unknown" contains "X."
630	Part III Address Unknown (Item 57)	1	If the financial institution's street address is unknown, enter "X." Otherwise space-fill.
631-680	Part III City (Item 58)	50	REQUIRED (conditional). Enter the financial institution's city, left justified and space-filled. Space-fill "Part III City Unknown" contains "X."
681	Part III City Unknown (Item 58)	1	If the financial institution's city is unknown, enter ".X" Otherwise space-fill.
682-684	Part III State (Item 59)	3	Enter the financial institution state code if the "Part III Country" code is "US," "CA," or "MX." See General Instruction 7 in Attachment C for information about the codes to be entered. Left justify and space-fill a two-digit entry. Space-fill if "Part III Country" is not "US," "CA," or "MX" or if the state is unknown.

Field Position(s)	Field Name	Length	Description and Remarks
685-693	Part III ZIP/Postal Code (Item 60)	9	REQUIRED (conditional). Enter the financial institution's ZIP Code or foreign postal code. Do not include punctuation or formatting such as hyphens, periods, and spaces within the entry. An entry must be five or nine digits if the "Part III Country" entry is "US." A nine-digit entry cannot end with four zeros or four nines if the "Part III Country" entry is "US." Left justify and space-fill this entry if less than nine digits. Space-fill if the "Part III Country" entry is not "US," "CA," or "MX," or if "Part III ZIP/Postal Code Unknown" contains "X."
694	Part III ZIP/Postal Code Unknown (Item 60)	1	If the financial institution ZIP Code or foreign postal code is unknown, enter "X." Otherwise space-fill this field.
695-696	Part III Country (Item 61)	2	REQUIRED (conditional). Enter the financial institution's country code. See General Instruction 7 in Attachment C for information about the codes to be entered. Space-fill if "Part III Country Unknown" contains "X."
697	Part III Country Unknown (Item 61)	1	If the financial institution's country is unknown, enter "X." Otherwise space-fill this field.
698-717	Part III Internal Control/File Number (Item 62)	20	Enter the financial institution's Internal Control/File Number for the FinCEN SAR being reported. Left justify and space-fill the entry. Space-fill if no number entered.
718-732	Part III Loss to Financial Institution (Item 63)	15	Enter the loss (in U.S. Dollars) to the financial institution where the activity occurred. This loss cannot be greater than the amount recorded in Item 26 for the amount involved in this report. Right justify and zero-fill this entry. Space-fill if no loss is recorded. The entry "0" for the amount of loss is NOT permitted in this item. See the Item 63 instructions in Attachment C for further information on entering amounts in this item.
733	Part III No Branch Activity (Item 65)	1	Enter "X" if no branch or office belonging to the financial institution was involved in the suspicious activity. There must be no Branch Office Information (2C) Records associated with this 2B record in the file. Otherwise space-fill this field.
734-1190	Filler	457	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Branch or Office Institution Where Activity Occurred (2C) Record

This record identifies information regarding the branch or office institution where the suspicious activity occurred. The number of 2C records will depend on the number of different branch or office locations where the suspicious activity occurred for each FinCEN SAR in the file. The 2C record item numbers refer to the FinCEN SAR Part III, Items 64-77. If "Part III No Branch Activity" within the 2B record contains "X," then there will be no 2C record recorded for the FinCEN SAR in the file.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2C."
3-12	Branch or Office Location Code	10	REQUIRED. Enter a unique numeric code for the different branch or office locations involved with FinCEN SARs. Right justify and zero-fill the entry.
13	Part III Branch's Role in Transaction (Item 64)	1	Enter the appropriate code to describe the branch's role in the transaction. Space-fill if no code is appropriate. <u>Code</u> <u>Description</u> A Selling location B Paying location C Both a & b
14-113	Part III Address of Branch or Office (Item 65)	100	Enter the branch or office street address, left justified and space-filled. Space-fill if the street address is unknown.
114-163	Part III Branch or Office City (Item 67)	50	Enter the branch or office city, left justified and space-filled. Space-fill if unknown.
164-166	Part III Branch or Office State (Item 68)	3	Enter the branch or office state code if the "Branch or Office Country" code is "US," "CA," or "MX." See General Instruction 7 in Attachment C for information about the codes to be entered. Space-fill if unknown.
167-175	Part III Branch or Office ZIP/Postal Code (Item 69)	9	Enter the branch or office ZIP Code or foreign postal code. Do not include punctuation or formatting such as hyphens, periods, and spaces within the entry. An entry must be five or nine digits if the "Branch or Office Country" entry is "US." A nine-digit entry cannot end with four zeros or four nines if the "Branch or Office Country" entry is "US." Left justify and space-fill this entry if less than nine digits. Space-fill if unknown.

Field Position(s)	Field Name	Length	Description and Remarks
176-177	Part III Branch or Office Country (Item 70)	2	REQUIRED. Enter the branch or office country code.
178-197	Part III Branch or Office RSSD Number (Item 66)	20	Enter the branch or office RSSD number, left justified and space-filled. Space-fill if no number entered.
198-1190	Filler	993	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Suspicious Activity Information (3A) Record – Required

This record identifies information regarding the suspicious activity. The number of 3A records will depend on the number of different FinCEN SARs included on the file. The 3A record may only occur one time per FinCEN SAR. The 3A record item numbers refer to the FinCEN SAR Item 1, Part II Items 26-40, and Part IV, Items 92-98.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3A."
3-7	Transaction Sequence Number	5	REQUIRED. Enter a sequential number starting with 00001 and increment by 1 for each suspicious activity (3A) record.
8	Attachment Indicator	1	Enter "X" if the suspicious activity is associated with an attachment. Please see Attachment D – Batch Attachments for formatting and submission instructions. Space-fill if no attachment is associated with the FinCEN SAR.
9	Type of Filing (Item 1)	1	REQUIRED (conditional). Enter "A" if the report is an initial report. Enter "B" if the report is a corrected or amended report. If neither applies, then this field must be space-filled and "C" must be entered in the following "Continuing Activity Report" field. If "A" for initial report is entered and the FinCEN SAR is a joint report, then "D" must be entered in "Joint Report." If "B" for corrected/amended report is entered and the prior report was a continuing report and/or joint report, then "Continuing Activity Report" and/or "Joint Report" must contain entries as appropriate. <u>Code</u> <u>Description</u> A Initial report B Correct/Amend prior report
10	Continuing Activity Report (Item 1)	1	REQUIRED (conditional). If the filing is a continuing activity report, enter "C." Otherwise space-fill this field.
11	Joint Report (Item 1)	1	If the filing is a joint report, enter "D." Either "Type of Filing" or "Continuing Activity Report" must contain an entry. Otherwise space-fill this field.
12-25	Prior Report Document Control Number/ BSA Identifier (Item 1)	14	REQUIRED (conditional). If the "Filing Type" is "B Correct/Amend prior report" or "C Continuing activity report", enter the prior report Document Control Number (DCN) or BSA Identifier (BSA ID). If the DCN or BSA ID is unknown, enter zeros in place of the unknown number. Space-fill if no entry.

Field Position(s)	Field Name	Length	Description and Remarks
26-40	Amount Involved In This Report (Item 26)	15	REQUIRED (conditional). Enter the amount (in U.S. Dollars) involved in the suspicious activity. Right justify and zero-fill this entry. Zero is not an amount, so the entry "0" for the amount involved is NOT permitted in this item. Space-fill if the amount is unknown or no amount is involved.
41	Amount Unknown or No Amount Involved (Item 26)	1	If the amount involved in the suspicious activity is unknown or no amount is involved, enter the appropriate code from the following list. Otherwise space-fill this field. <u>Code</u> <u>Description</u> A Amount unknown B No Amount involved
42-49	Date or Date Range of Suspicious Activity - From (Item 27)	8	REQUIRED. Enter the suspicious activity date or beginning suspicious activity date (if reporting a range of suspicious activity dates). Enter as a numeric 8-position field in the format: month, day, century, year (MMDDCCYY). This date cannot be greater than "Date Filed (Item 98)."
50-57	Date or Date Range of Suspicious Activity - To (Item 27)	8	Enter the most-recent date of the suspicious activity (if including a range of suspicious activity dates). Enter as a numeric 8-position field in the format: month, day, century, year (MMDDCCYY). This date cannot be earlier than the "Date or Date Range of Suspicious Activity - From (Item 27)" or greater than "Date Filed (Item 98)." Space-fill if no date entered.
58-72	Cumulative Amount (Item 28)	15	If "Continuing Activity Report" contains "C," enter the cumulative aggregated total U.S. Dollar amount involved for all SARs filed on the suspicious activity. The cumulative aggregated total dollar amount must be greater than or equal to the "Amount Involved In This Report." Enter a zero (0) if the amount is unknown or no amount is involved and "Continuing Activity Report" contains "C." See the Item 28 instructions in Attachment C for additional information on entering amounts in this field. Otherwise space-fill this field.

Field Position(s)	Field Name	Length	Description and Remarks
73-79	Structuring (Item 29)	7	<p>Enter the appropriate code(s) to identify suspicious activity that relates to structuring (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Alters transaction to avoid BSA recordkeeping requirement</p> <p>B Alters transaction to avoid CTR requirement</p> <p>C Customer cancels transaction to avoid BSA reporting and recordkeeping requirements</p> <p>D Multiple transactions below BSA recordkeeping threshold</p> <p>E Multiple transactions below CTR threshold</p> <p>F Suspicious inquiry by customer regarding BSA reporting or recordkeeping requirements</p> <p>Z Other</p>
80-129	Structuring - Other Description (Item 29)	50	REQUIRED (conditionally). If "Structuring" contains "Z," enter a brief description of the activity. Left justify and space-fill this entry. Space-fill if no entry.
130-131	Terrorist Financing (Item 30)	2	<p>Enter the appropriate code(s) to identify suspicious activity that relates to terrorist financing (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Known or suspected terrorist/terrorist organization</p> <p>Z Other</p>
132-181	Terrorist Financing - Other Description (Item 30)	50	REQUIRED (conditionally). If the "Terrorist Financing" contains "Z," enter a brief description of the activity. Left justify and space-fill the entry. Space-fill if no entry.

Field Position(s)	Field Name	Length	Description and Remarks
182-192	Fraud (Item 31)	11	<p>Enter the appropriate code(s) to identify suspicious activity that relates to fraud (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A ACH</p> <p>B Business loan</p> <p>C Check</p> <p>D Consumer loan</p> <p>E Credit/Debit card</p> <p>F Healthcare</p> <p>G Mail</p> <p>H Mass-marketing</p> <p>I Pyramid scheme</p> <p>J Wire</p> <p>Z Other</p>
193-242	Fraud - Other Description (Item 31)	50	REQUIRED (conditionally). If "Fraud" contains "Z," provide a brief description of the activity. Left justify and space-fill this entry. Space-fill if no entry.
243-247	Casinos (Item 32)	5	<p>Enter the appropriate code(s) to identify suspicious activity that relates to casinos (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Inquiry about end of business day</p> <p>B Minimal gaming with large transactions</p> <p>C Suspicious intra-casino funds transfers</p> <p>D Suspicious use of counter checks or markers</p> <p>Z Other</p>
248-297	Casinos - Other Description (Item 32)	50	REQUIRED (conditionally). If "Casinos" contains "Z," provide a brief description of the activity. Left justify and space-fill this entry. Space-fill if no entry.

Field Position(s)	Field Name	Length	Description and Remarks
298-310	Money Laundering (Item 33)	13	<p>Enter the appropriate code(s) to identify suspicious activity that relates to money laundering (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Exchanges small bills for large bills or vice versa</p> <p>B Suspicion concerning the physical condition of funds</p> <p>C Suspicion concerning the source of funds</p> <p>D Suspicious designation of beneficiaries, assignees or joint owners</p> <p>E Suspicious EFT/wire transfers</p> <p>F Suspicious exchange of currencies</p> <p>G Suspicious receipt of government payments/benefits</p> <p>H Suspicious use of multiple accounts</p> <p>I Suspicious use of noncash monetary instruments</p> <p>J Suspicious use of third-party transactors (straw-man)</p> <p>K Trade Based Money Laundering/Black Market Peso Exchange</p> <p>L Transaction out of pattern for customer(s)</p> <p>Z Other</p>
311-360	Money Laundering – Other Description (Item 33)	50	<p>REQUIRED (conditionally). If "Money Laundering" contains "Z," provide a brief description of the activity. Left justify and space-fill this entry. Space-fill if no entry.</p>
361-366	Identification / Documentation (Item 34)	6	<p>Enter the appropriate code to identify suspicious activity that relates to identification or documentation (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Changes spelling or arrangement of name</p> <p>B Multiple individuals with same or similar identities</p> <p>C Provided questionable or false documentation</p> <p>D Refused or avoided request for documentation</p> <p>E Single individual with multiple identities</p> <p>Z Other</p>
367-416	Identification / Documentation - Other Description (Item 34)	50	<p>REQUIRED (conditionally). If "Identification / Documentation" contains "Z," provide a brief description of the activity. Left justify and space-fill this entry. Space-fill if no entry.</p>

Field Position(s)	Field Name	Length	Description and Remarks
417-435	Other Suspicious Activities (Item 35)	19	<p>Enter the appropriate code to identify other suspicious activity (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Account takeover</p> <p>B Bribery or gratuity</p> <p>C Counterfeit instruments</p> <p>D Elder financial exploitation</p> <p>E Embezzlement/theft/disappearance of funds</p> <p>F Forgeries</p> <p>G Identity theft</p> <p>H Little or no concern for product performance penalties, fees, or tax consequences</p> <p>I Misuse of "free look"/cooling-off/right of rescission</p> <p>J Misuse of position or self-dealing</p> <p>K Suspected public/private corruption (domestic)</p> <p>L Suspected public/private corruption (foreign)</p> <p>M Suspicious use of informal value transfer system</p> <p>N Suspicious use of multiple transaction locations</p> <p>O Transaction with no apparent economic, business, or lawful purpose</p> <p>P Two or more individuals working together</p> <p>Q Unauthorized electronic intrusion</p> <p>R Unlicensed or unregistered MSB</p> <p>Z Other</p>
436-485	Other Suspicious Activities - Other Description (Item 35)	50	<p>REQUIRED (conditionally). If "Other Suspicious Activity" contains "Z," provide a brief description of the activity. Left justify and space-fill this entry. Space-fill if no entry.</p>
486-492	Insurance (Item 36)	7	<p>Enter the appropriate code to identify suspicious activity that relates to insurance (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Excessive insurance</p> <p>B Excessive or unusual cash borrowing against policy/annuity</p> <p>C Proceeds sent to or received from unrelated third party</p> <p>D Suspicious life settlement sales insurance (e.g., STOLI's, Viaticals)</p> <p>E Suspicious termination of policy or contract</p> <p>F Unclear or no insurable interest</p> <p>Z Other</p>

Field Position(s)	Field Name	Length	Description and Remarks
493-542	Insurance - Other Description (Item 36)	50	REQUIRED (conditionally). If "Insurance" contains "Z," provide a brief description of the activity. Left justify and space-fill this entry. Space-fill if no entry.
543-547	Securities/Futures/Options (Item 37)	5	Enter the appropriate code to identify suspicious activity that relates to securities, futures, or options (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry. <u>Code</u> <u>Description</u> A Insider trading B Market manipulation/wash trading C Misappropriation D Unauthorized pooling Z Other
548-597	Securities/Futures/Options - Other Description (Item 37)	50	REQUIRED (conditionally). If "Securities/Futures/Options" contains "Z," provide a brief description of the activity. Left justify and space-fill this entry. Space-fill if no entry.
598-602	Mortgage Fraud (Item 38)	5	Enter the appropriate code to identify suspicious activity that relates to mortgage fraud (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry. <u>Code</u> <u>Description</u> A Appraisal fraud B Foreclosure fraud C Loan Modification fraud D Reverse mortgage fraud Z Other
603-652	Mortgage Fraud - Other Description (Item 38)	50	REQUIRED (conditionally). If "Mortgage Fraud" contains "Z," provide a brief description of the activity. Left justify and space-fill this entry. Left justify if no entry.

Field Position(s)	Field Name	Length	Description and Remarks
653-672	Product Type(s) Involved (Item 39)	20	<p>Enter the code(s) for all product type(s) involved in the suspicious activity (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Bonds/Notes</p> <p>B Commercial mortgage</p> <p>C Commercial paper</p> <p>D Credit card</p> <p>E Debit card</p> <p>F Forex transactions</p> <p>G Futures/Options on futures</p> <p>H Hedge fund</p> <p>I Home equity loan</p> <p>J Home equity line of credit</p> <p>K Insurance/Annuity products</p> <p>L Mutual fund</p> <p>M Options on securities</p> <p>N Penny stocks/Microcap securities</p> <p>O Prepaid access</p> <p>P Residential mortgage</p> <p>Q Security futures products</p> <p>R Stocks</p> <p>S Swap, hybrid, or other derivatives</p> <p>Z Other</p>
673-722	Product Type(s) Involved- Other Description (Item 39)	50	REQUIRED (conditionally). If the "Product Type(s) Involved" contains "Z," briefly describe the product type involved.
723-732	Instrument Type(s)/Payment Mechanism(s) Involved (Item 40)	10	<p>Enter the code(s) for all Instrument Type(s)/Payment Mechanism(s) involved in the suspicious activity (check all that apply). Left justify and space-fill the entry. Do not include spaces between multiple entries. Space-fill if no entry.</p> <p><u>Code</u> <u>Description</u></p> <p>A Bank/Cashier's check</p> <p>B Foreign currency</p> <p>C Funds transfer</p> <p>D Gaming instruments</p> <p>E Government payment</p> <p>F Money orders</p> <p>G Personal/Business check</p> <p>H Travelers checks</p> <p>I U.S. Currency</p> <p>Z Other</p>

Field Position(s)	Field Name	Length	Description and Remarks
733-782	Instrument Type(s)/Payment Mechanism(s) Involved - Other Description (Item 40)	50	REQUIRED (conditionally). If "Instrument Type(s)/Payment Mechanism(s) Involved" contains "Z," briefly describe the product type(s) involved. Left justify and space-fill this entry. Space-fill if no entry.
783-932	LE Contact Agency (Item 92)	150	Enter the name of the law enforcement (LE) agency contacted by the filing institution. Left justify and space-fill this entry. Space-fill if no entry.
933-1082	LE Contact Name (Item 93)	150	Enter the name of the individual contacted at the law enforcement agency. Left justify and space-fill this entry. Space-fill if no entry.
1083-1098	LE Contact Telephone Number (Item 94)	16	Enter the law enforcement agency contact telephone number. Left justify and space-fill this entry. Space-fill if no entry.
1099-1104	LE Contact Telephone Extension (Item 94)	6	Enter the law enforcement contact telephone number extension. Left justify and space-fill this entry. Space-fill if no entry.
1105-1112	LE Contact Date (Item 95)	8	Enter the date the filing institution first contacted the law enforcement agency. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY). Space-fill if no entry.
1113-1122	Filing Institution Contact Office (Item 96)	10	REQUIRED. Enter the name of the contact office designated by the filing institution to provide information about this report. Left justify and space-fill the entry.
1123-1138	Filing Institution Phone Number (Item 97)	16	REQUIRED. Enter the telephone number of the contact office designated by the filing institution to provide information about this report. Do not include formatting such as spaces, hyphens, or parenthesis. Left justify and space-fill this entry.
1139-1144	Filing Institution Phone Number Extension (Item 97)	6	Enter the telephone extension (if any) of the contact office designated by the filing institution to provide information about this report. Left justify and space-fill this entry. Space-fill if no entry.
1145-1152	Date Filed (Item 98)	8	REQUIRED. Record the date filed as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
1153-1172	Internal Control/ File Number (Item 91)	20	Enter the filing institution Internal Control/File Number assigned to this report. Left justify and space-fill the entry. Space-fill if no entry.
1173-1190	Filler	18	Space-filled.

Field Position(s)	Field Name	Length	Description and Remarks
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Commodity Type (3B) Record

This record identifies information regarding the commodity type(s) involved in a suspicious activity. A maximum of 99 3B records may be associated with a Suspicious Activity Information (3A) Record. The 3B record item number refers to the FinCEN SAR Part II, Item 41. If no commodity type information is being reported there will be no 3B record for the FinCEN SAR in the file.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3B."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-57	Commodity Type (Item 41)	50	Enter the commodity type if a commodity is involved in the suspicious activity. Left justify and space-fill the entry.
58-1190	Filler	1133	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Product/Instrument Description (3C) Record

This record identifies information regarding the product/instrument description(s) involved in a suspicious activity. A maximum of 99 3C records may be associated with a Suspicious Activity Information (3A) Record. The 3C record item number refers to the FinCEN SAR Part II, Item 42. If no product or instrument description is being reported there will be no 3C record for the FinCEN SAR in the file.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3C."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-57	Product/Instrument Description (Item 42)	50	Enter a description of the product reported in Item 39 "Product Type(s) Involved" or the instrument recorded in Item 40 "Instrument Type(s)/Payment Mechanism(s) Involved". Left justify and space-fill this entry.
58-1190	Filler	1133	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Market Where Traded (3D) Record

This record identifies information regarding the market(s) where traded involved in a suspicious activity. A maximum of 99 3D records may be associated with a Suspicious Activity Information (3A) Record. The 3D record item number refers to the FinCEN SAR Part II, Item 43. If no market where traded is being reported there will be no 3D record for the FinCEN SAR in the file.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3D."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-12	Market Where Traded (Item 43)	5	Enter the three to five letter code for the market where the "Product Type(s) Involved" reported in Item 39 or the "Commodity Type" reported in Item 41 was traded. Use only the ISO 10383 Exchange/Market Identifier (MIC) Codes found at http://www.iso15022.org/MIC/homepageMIC.htm . Left justify and space-fill the entry.
13-1190	Filler	1178	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

IP Address (3E) Record

This record identifies information regarding the IP address(s) involved in a suspicious activity. A maximum of 99 3E records may be associated with a Suspicious Activity Information (3A) Record. The 3E record item number refers to the FinCEN SAR Part II, Item 44. If no IP address is being reported there will be no 3E record for the FinCEN SAR in the file.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3E."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-46	IP Address (Item 44)	39	Enter the IP address connected to the suspicious activity. If the IP address is IPv4, use a variation of the format nnn.nnn.nnn.nnn (n = number) with periods between the segments. If the IP address is IPv6, use a variation of the format ccc:ccc:ccc:ccc:ccc:ccc:ccc:ccc (c = character, IPv6 is alphanumeric in some segments) with colons between the segments. Left justify and space-fill the entry.
47-1190	Filler	1144	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

CUSIP Number (3F) Record

This record identifies information regarding the CUSIP Number(s) involved in a suspicious activity. A maximum of 99 3F records may be associated with a Suspicious Activity Information (3A) Record. The 3F record item number refers to the FinCEN SAR Part II, Item 45. If no CUSIP Number is being reported there will be no 3F record for the FinCEN SAR in the file.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3F."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-19	CUSIP Number (Item 45)	12	Enter the CUSIP Number of any securities product involved in the suspicious activity. Left justify and space-fill this entry.
20-1190	Filler	1171	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Subject (4A) Record – Required

This record contains information related to the subject’s identity. A maximum of 999 4A records may be associated with a Suspicious Activity Information (3A) Record. If all critical* subject information is unavailable, enter “B” in Field Position 9 of the Subject (4A) Record, and space-fill Items 3-20. NOTE: If there are no known accounts associated with the subject, enter “X” in Item 24, Field Position 342. If this field position is space-filled, there must be at least one “Subject - Affected TIN & Account Number (4I) Record” for the associated Subject (4A) Record. The 4A record item numbers refer to the FinCEN SAR Part I, Items 2-5, 7, 13-16, 20, & 24-25.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4A."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8	If Entity (Item 2a)	1	If the subject is an entity, enter “A.” Otherwise space-fill this field.
9	If All Critical* Subject Information Is Unavailable (Item 2b)	1	If all critical subject information is unavailable other than Item 24, enter “B.” All required items other than Item 24 must be space-filled if this field contains “B.” Otherwise space-fill this field.
10-159	Individual’s Last Name or Entity’s Legal Name (Item 3)	150	REQUIRED (conditional). Enter the last name of an individual or the legal name of an entity. Left justify and space-fill this entry. Space-fill if “Individual’s Last Name or Entity’s Legal Name Unknown” contains “X.”
160	Individual’s Last Name or Entity’s Legal Name Unknown (Item 3)	1	If the last name or legal name is unknown and Field Position 9 is space filled, enter “X.” Otherwise space-fill this field.
161-195	First Name (Item 4)	35	REQUIRED (conditional). Enter the individual’s first name. Left justify and space-fill this entry. Space-fill if “First Name Unknown” contains “X,” “If Entity” contains “A,” or “If All Critical* Subject Information Is Unavailable” contains “B.”
196	First Name Unknown (Item 4)	1	If the individual’s first name is unknown and Field Position 9 is space filled, enter “X.” Otherwise space-fill this field.
197-231	Middle Name or Middle Initial (Item 5)	35	Enter the individual’s middle name or middle initial. Left justify and space-fill this entry. Otherwise space-fill this field.

Field Position(s)	Field Name	Length	Description and Remarks
232-266	Suffix (Item 5)	35	Enter the subject name suffix, e.g. JR, SR, III, etc. Left justify and space-fill this entry. Otherwise space-fill this field.
267	Gender (Item 5a)	1	Enter the code for the individual's gender from the list below. Otherwise space-fill this field. NOTE: Item 5a does not create an obligation for a financial institution to collect this data when such collection would be in conflict with the financial institution's obligations under any other federal law. <u>Code</u> <u>Description</u> A Male B Female C Unknown
268-297	Occupation or Type of Business (Item 7)	30	Enter the subject's occupation or type of business. Left justify and space-fill this entry. Otherwise space-fill this field.
298-303	NAICS Code (Item 7)	6	Enter the NAICS Code for the subject's occupation or type of business. Use only the codes from the NAICS Code list found on the BSA E-Filing Web Site (http://bsaeiling.fincen.treas.gov/main.html). Use of codes not found on that list is prohibited. Left justify and space-fill this entry. Otherwise space-fill this field.
304-328	TIN (Item 13)	25	REQUIRED (conditional). Enter the subject's U.S. or foreign Taxpayer Identification Number (TIN). Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789". A TIN entry is also invalid if it is not equal to nine numbers and TIN Type is "A" or "B." Left justify and space-fill the entry. Space-fill if "TIN Unknown" contains "X."
329	TIN Unknown (Item 13)	1	If the subject's TIN is unknown and Field Position 9 is space filled, enter "X." Otherwise space-fill this field.
330	TIN Type (Item 14)	1	REQUIRED (conditional). Enter the code for the subject's TIN Type from the following list if a TIN has been recorded. Follow Item 14 instructions in Attachment C for recording a TIN Type when a TIN was provided but the TIN Type is unknown. Otherwise space-fill this field. <u>Code</u> <u>Description</u> A EIN B SSN/ITIN C Foreign

Field Position(s)	Field Name	Length	Description and Remarks
331	Form of Identification for Subject Unknown (Item 15)	1	If the subject's identification is unknown and Field Position 9 is space filled, enter "X." Otherwise space-fill this field. If this field is space-filled and Field Position 9 does not contain "B," there must be at least one "Subject Identification (4C) Record" associated with this subject.
332-339	Date of Birth (Item 16)	8	REQUIRED (conditional). Record the individual's date of birth as a numeric 8-position entry in the format MMDDCCYY where MM = month, DD = day, CC = century, and YY = year. If the birth day and or month is unknown, enter "00" for the unknown day or month. Space fill this field if "Date of Birth Unknown" contains "X" or if Item 2a "If Entity" contains "A."
340	Date of Birth Unknown (Item 16)	1	If the individual's date of birth is unknown and Field Position 9 is space-filled, enter "X." Space fill this field if the individual's date of birth is known or if Item 2a "If Entity" contains "A."
341	Corroborative Statement to Filer? (Item 20)	1	Indicate whether or not the filer received a corroborative statement from the individual by selecting the appropriate code (enter only one). Otherwise space-fill this field. <u>Code</u> <u>Description</u> A Yes B No
342	No Known Account Involved (Item 24)	1	If there are no known accounts associated with the subject enter "X." Otherwise space-fill. If this field position is space-filled, there must be at least one "Affected TIN & Account Number (4I) Record" in this file associated with the subject.
343	Subject Role in Suspicious Activity (Item 25)	1	Record the subject's role in the suspicious activity if applicable. Otherwise space-fill. <u>Code</u> <u>Description</u> A Purchaser/Sender B Payee/Receiver C Both a & b
344-1190	Filler	847	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Subject Address (4B) Record

This record contains information related to the subject's address. A maximum of 99 4B records may be associated with a Subject (4A) Record. If all critical information is unavailable for the subject there will be no 4B record for the FinCEN SAR in the file. The 4B record item numbers correspond to the FinCEN SAR Part I, Items 8-12.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4B."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-107	Part I Address (Item 8)	100	REQUIRED (conditional). Enter the subject's street address, left justified and space-filled. Space fill if "Part I Address Unknown" contains "X."
108	Part I Address Unknown (Item 8)	1	If the subject's street address is unknown, enter "X". Otherwise space-fill this field.
109-158	Part I City (Item 9)	50	REQUIRED (conditional). Enter the subject's city, left justified and space-filled. Space fill if "Part I City Unknown" contains "X."
159	Part I City Unknown (Item 9)	1	If the subject's city is unknown, enter "X". Otherwise space-fill this field.
160-162	Part I State (Item 10)	3	REQUIRED (conditional). Enter the two or three letter code for the subject's state if the "Country" code is "US," "CA," or "MX." Left justify and space-fill this entry. See General Instruction 7 in Attachment C for information about the codes to be entered. Space fill if "Part I Country" is a code other than "US," "CA," or "MX," or if "Part I State Unknown" contains "X."
163	Part I State Unknown (Item 10)	1	If the subject's state is unknown and Part I Country is "US," "CA," "MX," or unknown, enter "X". Otherwise space-fill.
164-172	Part I ZIP/Postal Code (Item 11)	9	REQUIRED (conditional). Enter the subject's ZIP Code or foreign postal code. A nine-digit code cannot end with four zeros or four nines if the "Country" entry is "US." ZIP Codes and foreign postal codes must be entered without formatting or special characters such as spaces or hyphens. Left justify and space-fill this entry. Space fill if "Part I ZIP/Postal Code Unknown" contains "X."

Field Position(s)	Field Name	Length	Description and Remarks
173	Part I ZIP/Postal Code Unknown (Item 11)	1	If the subject's ZIP Code or foreign postal code is unknown, enter "X". Otherwise space-fill this field.
174-175	Part I Country (Item 12)	2	REQUIRED (conditional). Enter the two-letter code for the subject's country. See General Instruction 7 in Attachment C for information about the codes to be entered. Space fill if "Part I Country Unknown" contains "X."
176	Part I Country Unknown (Item 12)	1	If the subject's country is unknown, enter "X." Otherwise space-fill this field.
177-1190	Filler	1014	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Subject Identification (4C) Record

This record contains information related to the subject's form of identification. A maximum of 99 4B records may be associated with a Subject (4A) Record. If all critical information is unavailable for the subject, or the form of identification for the subject is unknown, there will be no 4C record for the FinCEN SAR in the file. The 4C record item number corresponds to FinCEN SAR Part I, Item 15.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4C."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8	Form of Identification - Type (Item 15)	1	REQUIRED. Enter the code from the following list that best describes the subject's identification. <u>Code</u> <u>Description</u> A Driver's license/State ID B Passport C Alien registration Z Other
9-32	Form of Identification - Number (Item 15)	24	Enter the subject's identification number if known, left justified and space-filled without formatting such as hyphens or spaces. Otherwise space-fill this field.
33-35	Subject Identification Issuing State (Item 15)	3	Enter the appropriate two or three character code when the identification was issued by a known state, province, or territory of the United States, Canada, or Mexico. See General Instruction 7 in Attachment C for information about the codes to be entered. Otherwise space-fill this field.
36-37	Subject Identification Issuing Country (Item 15)	2	REQUIRED. Enter the appropriate code for the country, if known, that issued the identification or where the identification was issued. See General Instruction 7 in Attachment C for information about the codes to be entered.
38-87	Subject Identification - Other (Item 15)	50	REQUIRED (conditional). If "Form of Identification - Type" contains "Z," provide a description of the identification. Otherwise space-fill this field.
88-1190	Filler	1103	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Subject Alternative Name (4D) Record

This record contains information related to the subject's alternative name. A maximum of 99 4D records may be associated with a Subject (4A) Record. Do not include a 4D record if no alternative names are known. The 4D record item number corresponds to the FinCEN SAR Part I, Item 6.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4D."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-157	Part I Alternate Name (Item 6)	150	Enter the subject's alternate name, e.g. AKA for an individual or DBA for an entity). Do not include the acronyms "AKA" or "DBA" with the alternative name. Left justify and space-fill this entry.
158-1190	Filler	1033	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Subject Telephone Number (4E) Record

This record contains information related to the subject's telephone number. A maximum of 99 4E records may be associated with a Subject (4A) Record. Do not include a 4E record if no telephone number is known. The 4E record item numbers correspond to the FinCEN SAR Part I, Items 17-18.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4E."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8	Part I Phone Number - Type (Item 17)	1	Enter the code from the list below that describes the type of the subject's telephone number. Space-fill if the telephone type is unknown. <u>Code</u> <u>Description</u> A Home B Work C Mobile D Fax
9-24	Part I Phone Number (Item 18)	16	Enter the subject's telephone number as a single string without formatting such as hyphens, spaces, or parenthesis. Left justify and space-fill this entry.
25-30	Part I Phone Number Extension (Item 18)	6	Enter the subject's telephone extension number. Left justify and space-fill this entry. Otherwise space-fill this field.
31-1190	Filler	1160	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Subject E-mail Address (4F) Record

This record contains information related to the subject's e-mail address. A maximum of 99 4F records may be associated with a Subject (4A) Record. Do not include a 4F record if no e-mail address is known. The 4F record item number corresponds to the FinCEN SAR Part I, Item 19.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4F."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-57	E-mail Address (Item 19)	50	Enter the subject's e-mail address. Include all formatting, punctuation, and special characters in the e-mail address. Left justify and space-fill this entry.
58-1190	Filler	1133	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Subject Website (URL) Address (4G) Record

This record contains information related to the subject's website (URL) address. A maximum of 99 4G records may be associated with a Subject (4A) Record. Do not include a 4G record if no website (URL) address is known. The 4G record item number corresponds to the FinCEN SAR Part I, Item 19.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4G."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-524	Website (URL) Address (Item 19)	517	Enter the subject's website Uniform Resource Locator (URL) address. Include all punctuation and special characters present in the URL. Left justify and space-fill this entry.
525-1190	Filler	666	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Subject Relationship to Institution (4H) Record

This record contains information related to the subject's relationship to the institution(s) listed in Part III (Item 55) or Part IV (Item 80). A maximum of 99 4H records may be associated with a Subject (4A) Record. Do not include a 4H record if the subject has no relationship to a financial institution recorded in the Part III or Part IV of the FinCEN SAR. The 4H record item numbers refer to the FinCEN SAR Part I, items 21-23.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4H."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-32	Institution TIN (Item 21)	25	Enter the Taxpayer Identification Number (TIN) of the institution listed in Part III (Item 55) or Part IV (Item 80) which has a relationship with the subject. Left justify and space-fill this entry. Space-fill if the TIN is unknown.
33-44	Relationship of the Subject to an Institution (Item 21)	12	Enter the code(s) from the list below that describe the subject's relationship to the institution (enter all that apply). Left justify and space-fill this entry. Do not include spaces between multiple entries. <u>Code</u> <u>Description</u> B Accountant C Agent D Appraiser E Attorney F Borrower G Customer H Director I Employee J No relationship to institution K Officer L Owner or Controlling Shareholder Z Other
45-94	Relationship of the Subject to an Institution - Other Description (Item 21)	50	REQUIRED (conditional). If the relationship code is "Z," provide a brief description of the relationship. Left justify and space-fill this entry. Otherwise space-fill this field.

Field Position(s)	Field Name	Length	Description and Remarks
95	Status of Subject Relationship to Institution (Item 22)	1	Enter the code from the list below that describes the status of the relationship between the subject and the institution if a relationship identified in Item 21 is "H," "I," "K," or "L." Space-fill if the relationship identified in Item 21 is not "H," "I," "K," or "L." <u>Code</u> <u>Description</u> A Relationship continues B Terminated C Suspended/Barred D Resigned
96-103	Action Date (Item 23)	8	Enter the action date if the status of the relationship was "B," "C," or "D." Record the date as a numeric 8-position entry in the format MMDDCCYY where MM = month, DD = day, CC = century, and YY = year. This entry cannot be greater than Date Filed (Item 98) in the 3A record. Space-fill if the "Status of Subject Relationship to Institution" is "A" or space filled.
104-1190	Filler	1087	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Affected TIN & Account Number (4I) Record

This record contains information related to the financial institution(s) and/or account number(s) related to the subject. A maximum of 99 4I records may be associated with a Subject (4A) Record. NOTE: Each 4I record can hold only one financial institution TIN and one account number. If more than one account number is associated with the financial institution TIN identified in this record, the TIN must be recorded in a separate 4I record along with the additional account number for the TIN. If one or more account numbers are related to the subject, but the financial institution TIN is unknown, space-fill the TIN and enter a account number in as many 4I records as necessary to record all known account numbers. Conversely, if one or more TINs are related to the subject, but the account number is unknown, enter a financial institution TIN and space-fill the account number in as many 4I records as necessary to record all known TINs where account numbers are unknown. Do not include a 4I record if no account numbers are involved in the suspicious activity or if both the financial institution TIN and the account number are unknown. The 4I record item number refers to the FinCEN SAR Part I, Item 24.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4I."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8	Non-US Financial Institution (Item 24)	1	Enter "X" if the account is located at a non-US financial institution. Otherwise space-fill this field.
9-33	Financial Institution TIN and Account Number Related to Subject (Item 24)	25	Enter the Taxpayer Identification Number (TIN) of the financial institution holding the account related to the subject. Left justify and space-fill the entry. Space-fill if the TIN is unknown and the account number is known.
34-73	Financial Institution TIN and Account Number Related to Subject (Item 24)	40	Enter the account number of the financial institution account that is related to the subject. Left justify and space-fill the entry. Space-fill if the account number is unknown but the financial institution TIN is known.
74	Account Closed - Yes (Item 24)	1	Enter "X" if the account is closed. Otherwise space-fill this field.
75-1190	Filler	1116	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Narrative Description (5A) Record – Required

This record contains a detailed description of the suspicious activity. There can be more than one of this record type, but no more than 20 of these records for the same Suspicious Activity (3A) Record. NO CARRIAGE RETURNS ARE ALLOWED IN THE RECORD. The 5A record item number refers to the FinCEN SAR Part V.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "5A."
3-7	Transaction Sequence Number	5	REQUIRED. Enter the Transaction Sequence Number from the associate suspicious activity (3A) record.
8-857	Suspicious Activity Information - Narrative	850	REQUIRED. Enter a detailed description of the suspicious activity. Left justify and space-fill this entry.
858-1190	Filler	333	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill this field.

Suspicious Activity Information Summary (9A) Record – Required

There must be one of this record type for each Suspicious Activity Information (3A) Record on the file. This record contains counts of the number of suspicious activity record types associated with each FinCEN SAR reported.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "9A."
3-9	Suspicious Activity Count (3A)	7	REQUIRED. Enter "0000001" in this field.
10-16	Subject Count (4A)	7	REQUIRED. Enter the number of Subject (4A) Records for the Financial Institution(s). Right justify and zero-fill this entry.
17-23	Narrative Description (5A) Count	7	REQUIRED. Enter the number of Narrative Description (5A) Records for the Financial Institution(s). Right justify and zero-fill this entry.
24-30	Branch Office Information (2C) Count	7	REQUIRED. Enter the number of Branch Office Information (2C) Records for the Financial Institution(s). Right justify and zero-fill this entry.
31-1190	Filler	1160	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Filing Institution Summary (9B) Record – Required

There must be one of this record type for each Filing Institution Information (2A) Record on the file. This record contains counts of the number of 2B, 2C, 3A, 4A, and 5A record types associated with the Filing Institution Information (2A) Record.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "9B."
3-9	Financial Institution Where Activity Occurred Count (2B)	7	REQUIRED. Enter the number of Financial Institution Where Activity Occurred (2B) Records for the Filing Institution.
10-16	Suspicious Activity Count (3A)	7	REQUIRED. Enter the number of Suspicious Activity Information (3A) Records for the Filing Institution. Right justify and zero-fill this entry.
17-23	Subject Count (4A)	7	REQUIRED. Enter the number of Subject (4A) Records for the Filing Institution. Right justify and zero-fill this entry.
24-30	Narrative Description (5A) Count	7	REQUIRED. Enter the number of Narrative Description (5A) Records for the Filing Institution. Right justify and zero-fill this entry.
31-37	Branch Office Information (2C) Count	7	REQUIRED. Enter the number of Branch Office Information (2C) Records for the Filing Institution. Right justify and zero-fill this entry.
38-1190	Filler	1153	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

File Summary (9Z) Record – Required

There should only be one of these records on the file and it must be the very last record on the file. The record contains counts of the number of the various record types which are on the file. The File Summary (9Z) Record should contain the following data elements:

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "9Z."
3-9	Filing Institution Contact Information Count (2A)	7	REQUIRED. Enter the number of Filing Institution Information (2A) Records. Right justify and zero-fill this entry.
10-16	Financial Institution Where Activity Occurred Count (2B)	7	REQUIRED. Enter the number of Financial Institution Where Activity Occurred (2B) Records. Right justify and zero-fill this entry.
17-23	Suspicious Activity Count (3A)	7	REQUIRED. Enter the number of Suspicious Activity Information (3A) Records. Right justify and zero-fill this entry.
24-30	Subject Count (4A)	7	REQUIRED. Enter the number of Subject (4A) Records. Right justify and zero-fill this entry.
31-37	Narrative Description (5A) Count	7	REQUIRED. Enter the number of Narrative Description (5A) Records. Right justify and zero-fill this entry.
38-44	Branch Office Information (2C) Count	7	REQUIRED. Enter the number of Branch Office Information (2C) Records. Right justify and zero-fill this entry.
45-51	Attachment Count	7	REQUIRED. Enter the number of Attachments. Right justify and zero-fill. Right justify and zero-fill this entry.
52-1190	Filler	1139	Space-filled.
1191-1200	User Field	10	Use this field for any descriptive information you may require; Otherwise space-fill.

Acknowledgement Record Formats

The FinCEN SAR batch acknowledgement file defined below is provided in ASCII format. The acknowledgement file will contain a corresponding acknowledgement record for each record received on the batch file (NOTE: the narrative record will not have a corresponding acknowledgement record.).

Acknowledgement Transmitter (1A) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the transmitter data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 1A record.
3-10	Coverage Beginning Date	8	Field Position 508-515 of the incoming 1A record. Enter as a numeric 8-position field in the format: month, day, century, year (MMDDCCYY)
11-18	Coverage Ending Date	8	Field Position 516-523 of the incoming 1A record. Enter as a numeric 8-position field in the format: month, day, century, year (MMDDCCYY)
19-26	Transmitter Control Code (TCC)	8	Field Position 524-531 of the incoming 1A record.
27-29	Batch Sequence Number (BSN)	3	References the batch number of the original transmission file (532-534, 1A Record). This number is for BSA E-Filing internal use only.
30-119	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record begin with a "T," are 3 alphanumeric characters in length, and are left-justified. Unused error code positions are zero filled.
120-129	User Field	10	Field Positions 1191-1200 of the incoming 1A record.
130-150	Filler	21	Space-filled.

Acknowledgement Filing Institution Information (2A) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Filing Institution Information (2A) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 2A record.
3-27	Filing Institution TIN	25	Field Position 155-179 of the incoming 2A record. Unused field positions are space-filled.
28-117	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
118-127	User Field	10	Field Positions 1041-1050 of the incoming 2A record.
128-150	Filler	23	Space-filled.

Acknowledgement Financial Institution Where Activity Occurred (2B) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Financial Institution Where Activity Occurred (2B) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 2B record.
3-12	Financial Institution Location Code	10	Field Position 3-12 of the incoming 2B record.
13-102	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
103-112	User Field	10	Field Positions 1041-1050 of the incoming 2B record.
113-150	Filler	38	Space-filled.

Acknowledgement Branch or Office Where Activity Occurred (2C) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Branch or Office Where Activity Occurred (2C) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 2C record.
3-12	Branch or Office Location Code	10	Field Position 3-12 of the incoming 2C record.
13-102	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
103-112	User Field	10	Field Positions 1191-1200 of the incoming 2C record.
113-150	Filler	38	Space-filled.

Acknowledgement Suspicious Activity (3A) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Suspicious Activity (3A) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 3A record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 3A record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 3A record.
122-150	Filler	29	Space-filled.

Acknowledgement Commodity Type (3B) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Commodity Type (3B) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 3B record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 3B record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	Filler	10	Field Positions 1041-1050 of the incoming 3B record.
122-150	Filler	29	Space-filled.

Acknowledgement Product/Instrument Description (3C) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Product/Instrument Description (3C) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 3C record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 3C record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 3C record.
122-150	Filler	29	Space-filled.

Acknowledgement Market Where Traded (3D) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Market Where Traded (3D) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 3D record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 3D record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 3D record.
122-150	Filler	29	Space-filled.

Acknowledgement IP Address (3E) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the IP Address (3E) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 3E record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 3E record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 3E record.
122-150	Filler	29	Space-filled.

Acknowledgement CUSIP Number (3F) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the CUSIP Number (3F) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 3F record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 3F record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 3F record.
122-150	Filler	29	Space-filled.

Acknowledgement Subject (4A) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Subject (4A) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4A record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4A record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4A record.
122-150	Filler	29	Space-filled.

Acknowledgement Address (4B) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Address (4B) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4B record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4B record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4B record.
122-150	Filler	29	Space-filled.

Acknowledgement Identification (4C) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Identification (4C) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4C record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4C record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4C record.
122-150	Filler	29	Space-filled.

Acknowledgement Alternative Name (4D) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Alternative Name (4D) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4D record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4D record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4D record.
122-150	Filler	29	Space-filled.

Acknowledgement Telephone (4E) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Telephone (4E) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4E record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4E record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4E record.
122-150	Filler	29	Space-filled.

Acknowledgement E-mail Address (4F) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the E-mail Address (4F) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4F record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4F record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4F record.
122-150	Filler	29	Space-filled.

Acknowledgement Website (URL) Address (4G) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Website (URL) Address (4G) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4G record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4G record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4G record.
122-150	Filler	29	Space-filled.

Acknowledgement Relationship to Institution (4H) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Relationship to Institution (4H) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4H record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4H record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4H record.
122-150	Filler	29	Space-filled.

Acknowledgement Affected TIN & Account Number (4I) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record contains identifying information and error codes pertaining to the Affected Account Number (4I) Record data received by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 4I record.
3-7	Transaction Sequence Number	5	Field Position 3-7 of the incoming 4I record.
8-21	BSA Identifier	14	Assigned by FinCEN. A unique identifying number.
22-111	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 4 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 4I record.
122-150	Filler	29	Space-filled.

Acknowledgement Trailer for Transmitter (9Z) Record

This record is created by FinCEN as part of an acknowledgement file returned to the transmitter. This record is a systems control record and it summarizes the data processed by FinCEN.

Field Position(s)	Field Name	Length	Description and Remarks
1-2	Record Type	2	Field Position 1-2 of the incoming 9Z record.
3-12	Number of Filing Institution Contact Information (2A) Records in File	10	Generated by FinCEN.
13-22	Number of Suspicious Activity (3A) Records in File	10	Generated by FinCEN.
23-112	Error Codes	90	Please see Attachment A - Error Code List for a detailed description of each error code. Error codes associated with this record are 3 alphanumeric characters in length and are left-justified. Unused error code positions are zero filled.
112-121	User Field	10	Field Positions 1041-1050 of the incoming 9Z record.
122-150	Filler	29	Space-filled.

Attachment A – Error Code List

Error Code	Error Description	Record	Field Position	Report Field Number
Fatal Errors <i>*A fatal error will result in a rejection of the batch file (not including error code F24).</i>				
F02	Number of records reported does not match the computer count for the 2A record.			
F03	Number of records reported does not match the computer count for the 2B record.			
F04	Number of records reported does not match the computer count for the 3A record in the file.			
F09	Number of records reported does not match the computer count for the 4A records.			
F10	Number of records reported does not match the computer count for the 5A records.			
F11	A required 2A record is missing from the submitted file.			
F12	A required 2B record is missing from the submitted file.			
F13	A required 3A record is missing from the submitted file.			
F14	A required 4A record is missing from the submitted file.			
F15	A required 5A record is missing from the submitted file.			
F16	A required 1A record is missing from the submitted file.			
F17	A required 9A record is missing from the submitted file.			
F18	A required 9Z record is missing from the submitted file.			

Error Code	Error Description	Record	Field Position	Report Field Number
F21	A required 9B record is missing from the submitted file.			
F24	Number of forms reported on the batch form does not match the computed count of the forms found in the file.			
F34	An invalid record type was present in Field Position 1-2 in one or more records of the submitted file.			
F37	A duplicate "Transaction Sequence"/"Transaction Sequence Number" was present on the submitted file.			
F38	The "Transaction Sequence"/"Transaction Sequence Number" is missing from the submitted file.			
F39	A non-numeric "Transaction Sequence"/"Transaction Sequence Number" is present in the submitted file.			
F87	A problem was encountered while processing the attachment(s) that has resulted in the rejection of your submission. Please ensure you are following the correct procedures regarding the size, filename, and format of attachments or contact the BSA E-Filing Help Desk for assistance.			
F88	The Transmitter Control Code (TCC) specified in the file is not a valid production TCC.			
F89	The submitted batch contains an invalid format indicator in the 1A record.			
F93	An invalid line terminator was present on the submitted file			
F94	Cannot continue processing the submitted file because of previous errors encountered.			
F96	One, or more, invalid characters were present in the submitted file.			
F97	An invalid record sequencing was present on the submitted file.			
F98	An invalid record length was present on the submitted file.			

Error Code	Error Description	Record	Field Position	Report Field Number
F99	Unknown file error. Please contact the BSA E-Filing Help Desk for assistance.			
Validation Errors <i>*Validation errors are for informational purposes only.</i>				
E00	This submission has been rejected because it contains significant errors. Please fix and re-submit the file.			
E02	This submission has been accepted and will be processed by FinCEN, however it contains some errors which need to be corrected once this submission has been acknowledged.			
File Errors <i>*File error codes containing an asterisk (*) are primary errors that must be corrected.</i>				
T01	Transmitter name is blank.	1A	3-152	
T02	Transmitter address is blank.	1A	153-252	
T03	Transmitter city is blank.	1A	253-302	
T04	Transmitter state is blank.	1A	303-305	
T05	Transmitter ZIP Code or foreign postal code is blank.	1A	306-314	
T06	Transmitter telephone number is blank.	1A	317-332	
T07	Transmitter contact name is blank.	1A	333-482	
T08	Transmitter TIN is blank.	1A	483-507	
T09	Coverage beginning date is blank or invalid.	1A	508-515	
T10	Coverage ending date is blank or invalid.	1A	516-523	

Error Code	Error Description	Record	Field Position	Report Field Number
T12	The Transmitter Control Code is blank.	1A	524-531	
S201*	Filing institution primary federal regulator is blank.	2A	3-4	78
S202*	Filing institution primary federal regulator contains an invalid code.	2A	3-4	78
S203*	Filing institution name is blank.	2A	5-154	79
S204*	Filing institution TIN is blank.	2A	155-179	80
S205*	Filing institution TIN is an invalid number string such as all zeros, all nines, 123456789, or a U.S. TIN and not nine digits.	2A	155-179	80
S206	Filing institution TIN type is blank.	2A	180	81
S207	Filing institution TIN type contains an invalid code.	2A	180	81
S208	Filing institution type is blank.	2A	181	82
S209	Filing institution type contains an invalid code.	2A	181	82
S210	Filing institution type other description is blank.	2A	182-231	82z
S211	Filing institution type for Securities/Futures contains an invalid code.	2A	232-244	83
S212	Filing institution type for Securities/Futures other description is blank.	2A	245-294	83z
S213	Filing institution identification type contains an invalid code.	2A	295	84
S214	Filing institution identification number is blank.	2A	296-315	84f

Error Code	Error Description	Record	Field Position	Report Field Number
S215	Filing institution street address is blank.	2A	316-415	85
S216	Filing institution city is blank.	2A	416-465	86
S217	Filing institution state is not a valid state code and filing institution country is equal to CA, MX, or US.	2A	466-468	87
S218	Filing institution state is blank and the filing institution country is equal to CA, MX, or US.	2A	466-468	87
S219	Filing institution ZIP Code or foreign postal code is blank.	2A	469-477	88
S220	Filing institution ZIP Code is a nine digit code ending in four zeros/nines and the filing institution country is equal to US.	2A	469-477	88
S221	Filing institution ZIP Code is not equal to five or nine digits or contains non-numeric values and the filing institution country is equal to US.	2A	469-477	88
S222	Filing institution country is blank.	2A	478-479	89
S223	Filing institution country is not a valid country code.	2A	478-479	89
S224	Financial institution type is blank.	2B	13	47
S225	Financial institution type contains an invalid code.	2B	13	47
S226	Financial institution type other description is blank.	2B	14-63	47z
S227*	Financial institution primary federal regulator is blank.	2B	64-65	48
S228*	Financial institution primary federal regulator contains an invalid code.	2B	64-65	48
S229	Gaming institution type contains an invalid code.	2B	66-69	49

Error Code	Error Description	Record	Field Position	Report Field Number
S230	Gaming institution type other description is blank.	2B	70-119	49z
S231	Securities/Futures institution type contains an invalid code.	2B	120-129	50
S232	Securities/Futures institution type other description is blank.	2B	130-179	50z
S233	Financial institution identification type contains an invalid code.	2B	180	51
S234	Financial institution identification number is blank.	2B	181-200	51f
S235	The financial institution's role in the transaction contains an invalid code.	2B	201	52
S236*	Financial institution legal name is blank.	2B	202-351	53
S237*	Financial institution TIN is blank.	2B	503-527	55
S238*	Financial institution TIN is an invalid number string such as all zeros, all nines, 123456789, or a U.S. TIN and not nine digits.	2B	503-527	55
S239	Financial institution TIN type is blank.	2B	529	56
S240	Financial institution TIN type contains an invalid code.	2B	529	56
S241	Financial institution street address is blank.	2B	530-629	57
S242	Financial institution city is blank.	2B	631-680	58
S243	Financial institution state is not a valid state code.	2B	682-684	59
S244	Financial institution state is blank and financial institution country is equal to CA, MX, or US.	2B	682-684	59

Error Code	Error Description	Record	Field Position	Report Field Number
S245	Financial institution ZIP Code or foreign postal code is blank.	2B	685-693	60
S246	Financial institution ZIP Code is a nine digit code ending in four zeros/nines and financial institution country is equal to US.	2B	685-693	60
S247	Financial institution ZIP Code is not equal to five or nine digits or contains non-numeric values, and financial institution country is equal to US.	2B	685-693	60
S248	Financial institution country is blank.	2B	695-696	61
S249	Financial institution country is not a valid country code.	2B	695-696	61
S250	The loss reported for the financial institution contains non-numeric values or is in an invalid format.	2B	718-732	63
S251	The branch/office's role in the transaction contains an invalid code.	2C	13	64
S252	Branch/office street address is blank.	2C	14-113	65
S256	Branch/office ZIP Code is a nine digit code ending in four zeros or four nines and branch/office country is US.	2C	167-175	69
S257	Branch/office ZIP Code is not equal to five or nine digits, or contains non-numeric values and branch/office country is US.	2C	167-175	69
S258	Branch/office country is blank and Part III No Branch Activity (Item 65) is blank.	2C	176-177	70
S259	Branch/office country is not a valid country code.	2C	176-177	70
S301	Filing type is blank.	3A	9	1
S302	Filing type contains an invalid code.	3A	9	1
S303*	The amount involved in the suspicious activity report is blank.	3A	26-40	26

Error Code	Error Description	Record	Field Position	Report Field Number
S304*	The amount involved in the suspicious activity report contains non-numeric values or is in an invalid format.	3A	26-40	26
S305	The amount involved in the suspicious activity report is greater than the cumulative amount reported.	3A	26-40	26
S306*	The date or beginning date of the suspicious activity is blank.	3A	42-49	27a
S307	The date or beginning date of the suspicious activity is greater than the date filed.	3A	42-49	27a
S308	The date or beginning date of the suspicious activity is not greater than or equal to January 1, 1950.	3A	42-49	27a
S309*	The date or beginning date of the suspicious activity is not a numeric 8-position field in MMDDCCYY format where MM=month, DD=day, CC=century, YY=year.	3A	42-49	27a
S310	The ending date of the suspicious activity is greater than the date filed.	3A	50-57	27b
S311	The ending date of the suspicious activity is not a numeric 8-position field in MMDDCCYY format where MM=month, DD=day, CC=century, YY=year.	3A	50-57	27b
S312	The cumulative amount of the suspicious activity is blank when the report is a continuing report and an amount has been recorded in the amount involved.	3A	58-72	28
S313	The cumulative amount of the suspicious activity contains non-numeric values or is in an invalid format.	3A	58-72	28
S315	The suspicious activity "Structuring" contains one or more invalid codes.	3A	73-79	29
S316	The suspicious activity "Structuring" other description is blank.	3A	80-129	29z
S317	The suspicious activity "Terrorist Financing" contains one or more invalid codes.	3A	130-131	30
S318	The suspicious activity "Terrorist Financing" other description is blank.	3A	132-181	30z
S319	The suspicious activity "Fraud" contains one or more invalid codes.	3A	182-192	31

Error Code	Error Description	Record	Field Position	Report Field Number
S320	The suspicious activity "Fraud" other description is blank.	3A	193-242	31z
S321	The suspicious activity "Casinos" contains one or more invalid codes.	3A	243-247	32
S322	The suspicious activity "Casinos" other description is blank.	3A	248-297	32z
S323	The suspicious activity "Money laundering" contains one or more invalid codes.	3A	398-310	33
S324	The suspicious activity "Money laundering" other description is blank.	3A	311-360	33z
S325	The suspicious activity "Identification/Documentation" contains one or more invalid codes.	3A	361-366	34
S326	The suspicious activity "Identification/Documentation" other description is blank.	3A	367-416	34z
S327	The suspicious activity "Other suspicious activity" contains one or more invalid codes.	3A	417-435	35
S328	The suspicious activity "Other suspicious activity" other description is blank.	3A	436-485	35z
S329	The suspicious activity "Insurance" contains one or more invalid codes.	3A	486-492	36
S330	The suspicious activity "Insurance" other description is blank.	3A	493-542	36z
S331	The suspicious activity "Securities/Futures/Options" contains one or more invalid codes.	3A	543-547	37
S332	The suspicious activity "Securities/Futures/Options" other description is blank.	3A	548-597	37z
S333	The suspicious activity "Mortgage Fraud" contains one or more invalid codes.	3A	598-602	38
S334	The suspicious activity "Mortgage Fraud" other description is blank.	3A	603-652	38z

Error Code	Error Description	Record	Field Position	Report Field Number
S335*	The suspicious activity type for items 29 through 38 is blank when at least one item must contain an alpha character entry.	3A	73-652	29a-38z
S336	The product type(s) involved in the suspicious activity contains one or more invalid codes.	3A	653-672	39
S337	The product type(s) involved in the suspicious activity other description is blank.	3A	673-722	39z
S338	The instrument type(s)/payment mechanism(s) involved in the suspicious activity contains one or more invalid codes.	3A	723-732	40
S339	The instrument type(s)/payment mechanism(s) involved in the suspicious activity other description is blank.	3A	733-782	40z
S340	Law Enforcement telephone number contains non-numeric values or is in an invalid format.	3A	1083-1098	94
S341	Law Enforcement contact date is not a numeric 8-position field in MMDDCCYY format where MM=month, DD=day, CC=century, YY=year.	3A	1105-1112	95
S342	Law Enforcement contact date is greater than date filed.	3A	1105-1112	95
S343	Designated contact office is blank.	3A	1113-1122	96
S344	Designated contact telephone number is blank.	3A	1123-1138	97
S345	Designated contact telephone number contains non-numeric values or is in an invalid format.	3A	1121-1136	97
S346	Date filed is blank.	3A	1145-1152	98
S347	Date filed is not a numeric 8-position field in MMDDCCYY format where MM=month, DD=day, CC=century, YY=year.	3A	1145-1152	98
S348	Date filed is greater than the current date or is less than the date transmitted.	3A	1145-1152	98
S401	Subject "if entity" contains an invalid code.	4A	8	2a

Error Code	Error Description	Record	Field Position	Report Field Number
S402	Subject "all critical subject information unavailable" contains an invalid code.	4A	9	2b
S403*	Subject last/legal name is blank.	4A	10-159	3
S404	Subject first name is blank.	4A	161-195	4
S405	Subject gender contains an invalid code.	4A	267	5
S406	Subject street address is blank.	4B	8-107	8
S407	Subject city is blank.	4B	109-158	9
S408	Subject state is not a valid state code and subject country is equal to CA, MX, or US.	4B	160-162	10
S409	Subject state is blank and subject country is equal to CA, MX, or US.	4B	160-162	10
S410	Subject ZIP Code or foreign postal code is blank.	4B	164-172	11
S411	Subject ZIP Code is a nine digit code ending in four zeros/nines and subject country is equal to US.	4B	164-172	11
S412	Subject ZIP Code is not equal to five or nine digits or contains non-numeric values, and subject country is equal to US.	4B	164-172	11
S413	Subject country is blank.	4B	174-175	12
S414	Subject country is not a valid country code.	4B	174-175	12
S415*	Subject TIN is blank.	4A	304-328	13
S416	Subject TIN is an invalid number string such as all zeros, all nines, 123456789, or a U.S. TIN and not nine digits.	4A	304-328	13

Error Code	Error Description	Record	Field Position	Report Field Number
S417	Subject TIN type is blank.	4A	330	14
S418	Subject TIN type contains an invalid code.	4A	330	14
S419*	Subject identification is blank.	4C	8-87	15
S420	Subject identification type contains an invalid code.	4C	8	15
S421	Subject identification other description is blank.	4C	38-87	15
S422	Subject identification issuing state is not a valid state code and subject country is equal to CA, MX, or US.	4C	33-35	15f
S423	Subject identification issuing country is not a valid country code.	4C	36-37	15g
S424	Subject date of birth is blank.	4A	322-339	16
S425	Subject date of birth is less than January 1, 1900.	4A	322-339	16
S426	Subject date of birth contains non-numeric values or is in an invalid format.	4A	322-339	16
S427	Subject telephone type contains an invalid code.	4E	8	17
S428	Subject telephone number is blank and subject telephone type contains an entry.	4E	9-24	18
S429	Subject telephone number contains non-numeric values or is in an invalid format.	4E	9-24	18
S430	Subject e-mail address is in an invalid format.	4F	8-57	19
S431	Subject Website URL is in an invalid format.	4G	8-524	19
S432	Subject corroborative statement to filer contains an invalid code.	4A	341	20

Error Code	Error Description	Record	Field Position	Report Field Number
S434	The type of relationship of the subject to the institution listed in Part III or Part IV contains an invalid code.	4H	33-44	21
S435	The relationship of the subject to the institution listed in Part III or Part IV other description is blank.	4H	45-94	21z
S436	The status of the subject's relationship to the institution listed in Part III or Part IV contains an invalid code.	4H	95	22
S437	The action date related to the status of the subject's relationship to the institution listed in Part III or Part IV is blank and Item 22b, 22c, or 22d is checked.	4H	96-103	23
S438	The action date related to the status of the subject's relationship to the institution listed in Part III or Part IV contains non-numeric values or is in an invalid format.	4H	96-103	23
S439	The action date related to the status of the subject's relationship to the institution listed in Part III or Part IV is greater than the date filed.	4H	96-103	23
S501*	The Narrative Description contains one or more blank records.	5A	8-857	

Attachment B – Error Correction Instructions

This attachment identifies the requirements and procedures for correcting FinCEN SAR errors reported to batch filers during the FinCEN SAR acknowledgement process.

Error Categories:

There are two types of errors identified in batch files: format errors that may result in automatic rejection of a batch file and file errors that represent errors in data entered in individual fields. Fatal format errors prevent the batch file from being processed. For example, error F18 “A required 9Z record is missing from the submitted file” is a fatal error because each batch file must contain a 9Z record. Error S224 “Financial institution type is blank” is a file error because it indicates data is missing from a record.

File errors are classified as primary or secondary errors, depending on their importance. Primary errors are file errors that violate electronic filing requirements or instructions and so degrade FinCEN SAR data quality that they must be corrected. Primary errors make it difficult for regulators, analysts, and law enforcement investigators to locate the FinCEN SARs in the database or identify the nature and circumstances of the suspicious activity. Examples of such errors include blank last names or legal names, missing financial institution Employer Identification Numbers, or an invalid entry in the suspicious activity date field. Attachment A – Error Code List identifies primary errors by adding an asterisk (*) to the four digit error code.

Secondary errors are file errors that violate electronic filing requirements or instructions but have a lesser impact on FinCEN SAR data quality. Examples of secondary errors are ZIP Codes that end in four zeros (e.g. 123450000), missing dates of birth, or invalid telephone numbers.

Correction Requirements:

Filers should immediately correct and resubmit a batch file rejected for fatal errors when notified by FinCEN the batch file was not accepted. Rejection of a batch file does not relieve the filer of the responsibility to file a FinCEN SAR within the time frames established by the BSA.

When a batch file is accepted by the BSA E-Filing Program, filers receive an acknowledgement file that records all errors identified in the batch file. A FinCEN SAR that contains primary errors must be re-filed as a corrected report with the primary errors and any secondary errors corrected. FinCEN SARs that contain only secondary errors need not be corrected. FinCEN requires that filers prevent all reported errors in their future filings.

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, filers should notify FinCEN by writing to:**

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

This correspondence should explain the technical issues that prevent meeting this time frame, provide an estimate of when the issues will be resolved, and include a contact name and telephone number.

Correction Procedures:

A FinCEN SAR batch file is rejected when it contains fatal format errors. The filer must correct all errors identified in the batch file and resubmit the batch file to BSA E-Filing. Because they were not accepted by FinCEN, all FinCEN SARs in the re-submitted batch file must retain their original Type of Filing. Do not identify FinCEN SARs in a re-filed batch file as corrected reports unless they originally were filed as corrected reports in the rejected batch file.

If errors in an accepted batch file involve primary file errors, filers must file corrected reports on all FinCEN SARs containing primary file errors using the following procedures:

- Make the corrections to both the primary and secondary errors in all FinCEN SARs that contains primary errors. Filers are encouraged, but not required, to correct any secondary errors in FinCEN SARs that contained no primary errors.
- Enter "B" at Field Position 9 "Type of Filing" in the Suspicious Activity Information (3A) Record for each corrected FinCEN SAR.
- Enter the prior report's BSA Identifier from the FinCEN SAR acknowledgement file at Field Position 12-25 "Prior Report Document Control/File Number" in the Suspicious Activity Information (3A) Record for each corrected FinCEN SAR.
- Ensure that Field Position 1145-1152 contains a new "Date Filed" in the Suspicious Activity Information (3A) Record for each corrected FinCEN SAR.
- Complete all other data in the FinCEN SARs in their entirety.
- Record the nature of all corrections at the beginning of the initial Narrative Description (5A) Record for each corrected FinCEN SAR.
- Retransmit the corrected FinCEN SARs in a new batch file. Do not re-transmit the original batch file because this will cause duplicate database entries on any FinCEN SARs that were not corrected.

FinCEN monitors FinCEN SAR filings to identify financial institutions that fail to correct primary errors in prior filings or to prevent previously-reported errors of any type in future filings. FinCEN may report such failures to a financial institution's primary federal/state regulator or BSA examiner.

Attachment C – Electronic Filing Instructions

Safe Harbor: Federal law (31 U.S.C. 5318(g)(3)) provides financial institutions complete protection from civil liability for all reports of suspicious transactions made to appropriate authorities, including supporting documentation, regardless of whether such reports are filed pursuant to a regulatory requirement or on a voluntary basis. Specifically, the law provides that a financial institution, and its directors, officers, employees, and agents, that make a disclosure of any possible violation of law or regulation, including in connection with the preparation of suspicious activity reports, “shall not be liable to any person under any law or regulation of the United States, any constitution, law, or regulation of any State or political subdivision of any State, or under any contract or other legally enforceable agreement (including any arbitration agreement), for such disclosure or for any failure to provide notice of such disclosure to the person who is the subject of such disclosure or any other person identified in the disclosure.”

Confidentiality of SARs:

A FinCEN Suspicious Activity Report (FinCEN SAR), and any information that would reveal the existence of the FinCEN SAR (collectively, “SAR information”), are confidential, and may not be disclosed except as specified in 31 U.S.C. 5318(g)(2) and in FinCEN’s regulations (31 CFR Chapter X).

SAR Sharing:

FinCEN has concluded that a depository institution that has filed a SAR may share the SAR, or any information that would reveal the existence of the SAR, with an affiliate, as defined in FinCEN Guidance FIN-2010-G006 issued January 3, 2011, provided the affiliate is subject to a SAR regulation. The sharing of SARs with such affiliates facilitates the identification of suspicious transactions taking place through the depository institution’s affiliates that are subject to a SAR rule. Therefore, such sharing within the depository institution’s corporate organizational structure is consistent with the purposes of Title II of the BSA.

Prohibition on Disclosures by Financial Institutions:

Federal law (31 U.S.C. 5318(g)(2)) provides that a financial institution, and its directors, officers, employees, and agents who, pursuant to any statutory or regulatory authority or on a voluntary basis, report suspicious transactions to the government, may not notify any person involved in the transaction that the transaction has been reported. Provided that no person involved in the suspicious activity is notified, 31 CFR Chapter X clarifies that the following activity does not constitute a prohibited disclosure:

- Disclosure of SAR information to certain governmental authorities or other examining authorities that are otherwise entitled by law to receive SAR information or to examine for or investigate suspicious activity;

- Disclosure of the underlying facts, transactions, and documents upon which a FinCEN SAR is based; and
- For those institutions regulated by a Federal functional regulator (Federal bank regulatory agencies, the Securities and Exchange Commission (SEC), and the Commodity Futures Trading Commission (CFTC)), the sharing of SAR information within an institution's corporate organizational structure, for purposes that are consistent with the Bank Secrecy Act, as determined by regulation or guidance.

Prohibition on Disclosures by Government Authorities:

Federal law (31 U.S.C. 5318(g)(2)) also provides that an officer or employee of any Federal, state, local, tribal, or territorial government within the United States who has knowledge that such report was made, may not disclose to any person involved in the transaction that the transaction has been reported, other than as necessary to fulfill the official duties of such officer or employee. FinCEN's regulations clarify that "official duties" must be consistent with Title II of the Bank Secrecy Act and shall not include the disclosure of a SAR, or any information that would reveal the existence of a SAR, in response to a request for disclosure of non-public information or a request for use in a private legal proceeding, including a request pursuant to 31 CFR § 1.11.

FinCEN SAR Filing Instructions:

1. Who Must File: Certain financial institutions operating in the United States shall file with FinCEN, to the extent and in the manner required by 31 CFR Chapter X and 12 CFR §§ 21.11, 163.180, 208.62, 353.3, and 748.1, a report of any suspicious transaction relevant to a possible violation of law or regulation. The following financial institutions are required to file a FinCEN SAR: Banks (31 CFR §1020.320) including Bank and Financial Holding Companies (12 CFR § 225.4); Casinos and Card Clubs (31 CFR § 1021.320); Money Services Businesses (31 CFR § 1022.320); Brokers or Dealers in Securities (31 CFR § 1023.320); Mutual Funds (31 CFR § 1024.320); Insurance Companies (31 CFR § 1025.320); Futures Commission Merchants and Introducing Brokers in Commodities (31 CFR § 1026.320); and Residential Mortgage Lenders and Originators (31 CFR § 1029.320).

2. Filing Deadlines: A FinCEN SAR shall be filed no later than 30 calendar days after the date of the initial detection by the reporting financial institution of facts that may constitute a basis for filing a report. If no suspect is identified on the date of such initial detection, a financial institution may delay filing a FinCEN SAR for an additional 30 calendar days to identify a suspect, but in no case shall reporting be delayed more than 60 calendar days after the date of such initial detection. In situations involving violations that require immediate attention, such as terrorist financing or ongoing money laundering schemes, the financial institution shall immediately notify by telephone an appropriate law enforcement authority in addition to filing timely a FinCEN SAR. Financial institutions wishing voluntarily to report suspicious

transactions that may relate to terrorist activity may call FinCEN's Financial Institutions Hotline at 1-866-556-3974 in addition to filing timely a FinCEN SAR.

3. Filing Requirements for Financial Institutions: A financial institution must report any transaction that requires reporting under the terms of 31 CFR Chapter X if the transaction is conducted or attempted by, at, or through the financial institution and involves or aggregates at least \$5,000 (\$2,000 for money services businesses, except as provided in Section 6 of this document) and the financial institution knows, suspects, or has reason to suspect that the transaction or pattern of transactions of which the transaction is a part:

- Involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity (including, without limitation, the ownership, nature, source, location, or control of such funds or assets) as part of a plan to violate or evade any Federal law or regulation or to avoid any transaction reporting requirement under Federal law or regulation;
- Is designed, whether through structuring or other means, to evade any requirement of 31 CFR Chapter X or any other regulation promulgated under the Bank Secrecy Act, Public Law 91-508, as amended, codified at 12 U.S.C 1829b, 12 U.S.C. 1951-1959, and 31 U.S.C. 5311-5332;
- Has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the financial institution knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction, or
- Involves the use of the financial institution to facilitate criminal activity.

4. Additional Filing Instructions for Banks: In addition to the above requirements, a bank (as defined in 31 CFR § 1010.100) must file a FinCEN SAR for activity (as required by 31 CFR § 1020.320 and 12 CFR §§ 21.11, 163.180, 208.62, 353.3, and 748.1) involving:

- **Insider abuse involving any amount.** Whenever the bank detects any known or suspected Federal criminal violations, or pattern of criminal violations, committed or attempted against the financial institution or involving a transaction or transactions conducted through the financial institution, where the bank believes that it was either an actual or potential victim of a criminal violation, or series of criminal violations, or that the bank was used to facilitate a criminal transaction, and the bank has a substantial basis for identifying one of its directors, officers, employees, agents or other institution-affiliated parties as having committed or aided in the commission of a criminal act regardless of the amount involved in the violation.

- **Violations aggregating \$5,000 or more where a suspect can be identified.** Whenever the bank detects any known or suspected Federal criminal violation, or pattern of criminal violations, committed or attempted against the bank or involving a transaction or transactions conducted through the bank and involving or aggregating \$5,000 or more in funds or other assets, where the bank believes that it was either an actual or potential victim of a criminal violation, or series of criminal violations, or that the bank was used to facilitate a criminal transaction, and the bank has a substantial basis for identifying a possible suspect or group of suspects. If it is determined prior to filing this report that the identified suspect or group of suspects has used an “alias,” then information regarding the true identity of the suspect or group of suspects, as well as alias identifiers, such as drivers’ licenses or social security numbers, addresses and telephone numbers, must be reported.
- **Violations aggregating \$25,000 or more regardless of a potential suspect.** Whenever the bank detects any known or suspected Federal criminal violation, or pattern of criminal violations, committed or attempted against the bank or involving a transaction or transactions conducted through the bank and involving or aggregating \$25,000 or more in funds or other assets, where the bank believes that it was either an actual or potential victim of a criminal violation, or series of criminal violations, or that the bank was used to facilitate a criminal transaction, even though there is no substantial basis for identifying a possible suspect or group of suspects.

5. Voluntary FinCEN SAR Filings: Financial institutions may also file with FinCEN a report of any suspicious transaction that it believes is relevant to the possible violation of any law or regulation but whose reporting is not required by 31 CFR Chapter X. A voluntary filing does not relieve a financial institution from the responsibility of complying with any other reporting requirements imposed by the SEC, the CFTC, a self-regulatory organization (SRO) (as defined in section 3(a)(26) of the Securities Exchange Act of 1934, 15 U.S.C. 78c (a)(26)), or any Registered Futures Association (RFA) or Registered Entity (RE) (as these terms are defined in the Commodity Exchange Act, 7 U.S.C. 21 and 7 U.S.C. 1a(29)).

6. Exceptions: The following are exceptions to the FinCEN SAR reporting requirements:

- A bank, casino, broker or dealer in securities (BD), futures commission merchant (FCM), or introducing broker in commodities (IB-C) is not required to file a FinCEN SAR for a robbery or burglary committed or attempted against the financial institution when the robbery or burglary is reported to appropriate law enforcement authorities.
- A FinCEN SAR is not required to be filed for lost, missing, counterfeit, or stolen securities that are reported pursuant to the requirements of 17 CFR § 240.17f-1.
- A BD is not required to file a FinCEN SAR on violations of any of the Federal securities laws or the rules of a SRO by the BD or any of its officers, directors, employees or other

registered representatives, other than a violation of 17 CFR § 240.17a-8 or 17 CFR § 405.4, so long as such violation is appropriately reported to the SEC or an SRO.

- An FCM or an IB-C, or any of its officers, directors, employees or associated persons, is not required to file a FinCEN SAR for a violation of the Commodity Exchange Act (7 U.S.C. 1 *et seq.*), the regulations of the CFTC (17 CFR Chapter 1), or the rules of any RFA or RE (as those terms are defined in the Commodity Exchange Act, 7 U.S.C. 21 and 7 U.S.C. 1a(29)), as long as such violation is appropriately reported to the CFTC, an RFA, or RE. This exception does not apply to violations of 17 CFR § 42.2.
- An insurance company is not required to report the submission to it of false or fraudulent information to obtain a policy or make a claim, unless the company has reason to believe that that the false or fraudulent submission relates to money laundering or terrorist financing.
- An issuer of money orders or traveler's checks is not required to report a transaction or pattern of transactions when the transactions were identified through a review of clearance records or other similar records and the transaction amount or aggregated transaction amount involves funds or other assets of less than \$5,000.

7. Additional Reporting: The Bank Secrecy Act requires financial institutions to file a Currency Transaction Report (CTR) in accordance with the Department of the Treasury's implementing regulations (31 CFR § 1010.310) whenever a currency transaction exceeds \$10,000. If a currency transaction exceeds \$10,000 and is otherwise reportable as suspicious activity, the institution must file both a CTR (reporting the currency transaction) and a FinCEN SAR (reporting the suspicious activity). If a currency transaction is \$10,000 or less and is otherwise reportable as a suspicious activity, the institution should only file a FinCEN SAR. Appropriate records must be maintained in each case. Residential Mortgage Lenders and Originators are required to file Form 8300, Report of Cash Payments Over \$10,000 Received in a Trade or Business, instead of a CTR.

FinCEN SAR Electronic Filing Instructions

General Instructions:

1. Filing Reports: This report should be E-filed through the Financial Crime Enforcement Network (FinCEN) BSA E-Filing System. Go to <http://bsaefiling.fincen.treas.gov> to register if not already registered. Financial institutions that file reports individually will use FinCEN's discrete FinCEN Suspicious Activity Report (FinCEN SAR) to file their reports. Financial institutions that use batch filing or system-to-system filing to transmit multiple reports must transmit files that conform to the requirements of FinCEN's "General Specifications for Electronic Filing of Bank Secrecy Act (BSA) Reports" (General Specifications) and "FinCEN Suspicious Activity Report (FinCEN SAR) Electronic Filing Requirements."

2. Recording Information: Complete each FinCEN SAR by providing as much information as possible. Although all items should be completed fully and accurately, items marked with an asterisk (*) must be completed even when the required data are unknown. Filers must follow the electronic filing instructions for these items by providing the required data or, if instructions permit, by checking the box “Unknown” to indicate that the required data was unknown. Items that do not begin with an asterisk must be completed if the data are known and will be left blank if the data are unknown. If an item’s instructions differ from this general instruction, the item instructions must be followed. These instructions supersede all prior SAR instructions and FinCEN guidance on use of special responses in SAR items when the data are unknown or not available in an electronic filing. Therefore, the use of special responses such as “UNKNOWN,” “NONE,” “NOT APPLICABLE,” or “XX” and their variants is prohibited in the FinCEN SAR.

NOTE: Throughout these instructions the phrase “check box” and similar wording is used to denote checking an appropriate box in certain data items on the discrete FinCEN SAR. This is deemed equivalent to instructions in the Electronic Filing Requirements to enter appropriate codes in the same data items in transmission files. For example, the requirement to check box 1 “Initial report” in the discrete FinCEN SAR is the equivalent of entering code “A” in “Type of Filing” in the Electronic Filing Requirements Suspicious Activity Information (3A) Record. In some discrete FinCEN SAR data items check boxes have been replaced by drop-down lists.

NOTE: Throughout these instructions there are requirements to complete items multiple times in a discrete FinCEN SAR if the filer has multiple entries for that item. This is deemed equivalent to completing multiple records for that item in the Electronic Filing Requirements. For example, these instructions direct filers to complete multiple Item 6 “Alternate name” fields if the filer has knowledge of multiple alternate names for a subject. This is equivalent to a batch filer completing multiple Subject Alternative Name (4D) Records for the same subject.

3. Corrected/Amended Reports: A corrected report on a previously-filed FinCEN SAR or prior SAR versions must be filed whenever errors are discovered in the data reported in that FinCEN SAR. An amended report must be filed on a previously-filed FinCEN SAR or prior SAR versions whenever new data about a reported suspicious activity is discovered and circumstances will not justify filing a continuing report (see General Instruction 4). Both corrected and amended reports must be completed in their entirety, with the necessary corrections or amendments made to the data. In both cases box 1b “Correct/Amend prior report” must be checked. If known, the prior report’s Document Control Number (DCN) or BSA Identifier (BSA ID) must be entered in field 1e. If the prior report’s DCN or BSA ID is unknown, field 1e should be zero-filled. All corrections or amendments must be described completely at the beginning of the Part V Suspicious Activity Information – Narrative section. If a FinCEN SAR is filed to correct or amend a prior SAR version, the FinCEN SAR must be completed in its entirety. This includes FinCEN SAR items that apply to the suspicious activity but were not present on the prior SAR version. FinCEN SAR items not on the prior SAR version need not be

described in the narrative. BSA IDs, which replaced DCNs, are provided in acknowledgement records sent to member financial institutions by the BSA E-Filing System.

4. Continuing Reports: A continuing report should be filed on suspicious activity that continues after an initial FinCEN SAR is filed. Continuing reports should be filed at least every 90 days until the suspicious activity ceases. Continuing reports must be completed in their entirety, including the information about all subjects involved in the suspicious activity and all financial institutions where the activity occurred. The continuing report Part V narrative should include all details of the suspicious activity for the 90-day period encompassed by the report, and only such data from prior reports as is necessary to understand the activity. Do not reproduce the narratives from prior reports in the continuing report. Provide both the dollar amount involved in the suspicious activity for the 90-day period in Item 26 and the cumulative dollar amount for the current and all prior related reports in Item 28. If continuing losses are involved for any financial institution recorded in Part III, record the 90-day loss in Item 63 and the cumulative loss in Part V.

5. Joint Report: A FinCEN SAR may be jointly filed when two or more distinct financial institutions collaborate in filing a single FinCEN SAR on suspicious activity involving all of the collaborating financial institutions. Financial institutions are “distinct” for this purpose when they are different legal entities; a financial institution is not distinct from its own branches. Joint filing of a single FinCEN SAR is prohibited when any of the Part I “Subject Information” subjects of the would-be jointly filed FinCEN SAR have a box in Item 21 checked that identifies the subject as a director, employee, officer, or owner/controlling shareholder of the filing institution or a would-be joint filer. In that case separate FinCEN SARs must be filed by each institution. To be a jointly-filed FinCEN SAR, box 1d “Joint report” must be checked. In addition, the filing institution listed in Part IV “Filing Institution Contact Information” must identify in Part V “Suspicious Activity Information – Narrative” which Part III “Information about Financial Institution Where Activity Occurred” institutions are joint filers. The filing institution must include joint filer contact information in Part V, along with a description of the information provided by each joint filer. Record joint filer information in Part III Items 47 through 63 and joint filer branch information in Part III Items 64 through 77. Filing a joint FinCEN SAR does not relieve joint filers of the responsibility to report information about the suspicious activity that was not included in the joint filing. A filing institution cannot designate another institution as a joint filer unless the designated joint filer is aware of and approves the FinCEN SAR filing in its entirety. A filer that designates another institution as a joint filer without gaining that institution’s agreement to the joint filing and approval of the contents of the joint filing may have committed a willful violation of the Bank Secrecy Act, if the improper designation leads to the disclosure of the SAR filing to a person not entitled to information about the filing. Both filers and joint filers are required to keep copies of the FinCEN SAR and their own supporting documentation for five (5) years after the date of filing.

6. Supporting Documentation: Filers can include a single Microsoft Excel compatible comma separated values (CSV) file with no more than one megabyte of data as an attachment to the

FinCEN SAR. The contents of this file must be described in Part V. This file would be most suitable for documenting transaction records that are too numerous to record in Part V. Do not include any other supporting documentation with the FinCEN SAR. Instead, describe in Part V other supporting documentation not included in the file. Filers must retain all supporting documentation or a business record equivalent for five (5) years from the date of the report (31 CFR § 1010.430). All supporting documentation (such as copies of instruments; receipts; sale, transaction or clearing records; photographs; and surveillance audio or video recordings) must be made available to appropriate authorities upon request. See Attachment D for information on attaching comma separated (.CSV) files to a FinCEN SAR filing.

7. Addresses: For addresses in the U.S., Canada, or Mexico enter the permanent street address, city, two or three letter state/territory/province code, ZIP Code or foreign postal code, and two letter country code for the individual or entity recorded in Part I, Part III, or Part IV. Provide the apartment number or suite number, if known, following the street address. A non-location address such as a post office box or rural route number should be used only if no other street address information is available. ZIP Codes must be five or nine digits. ZIP Codes and foreign postal codes must be entered without formatting or special characters such as spaces or hyphens. For example, the ZIP Code 12354-6120 would be entered as 123546120. The foreign postal code HKW 702 would be entered HKW702. For other foreign addresses enter the street address, city, postal code, and two letter country code or address equivalent. If a foreign address contains other address information that does not conform to the FinCEN SAR address format, record equivalent address information in the FinCEN SAR address items and the full address in Part V. Complete any address item that is known, even if the complete address is unknown. No abbreviations are permitted in city names, which must be completely spelled out. A U.S. city name must match the city name used by the U.S. Postal Service for the associated state and ZIP Code. For U.S. address use only the authorized U.S. Postal Service state, territory, or military address abbreviations found at <https://www.usps.com/ship/official-abbreviations.htm>. For Canadian provinces and territories use the Canada Post Corporation codes found at <http://www.canadapost.ca/tools/pg/manual/PGaddress-e.asp#1380608>. For Mexican states and territories use the ISO 3166-2 three-letter codes found at http://www.commondatahub.com/live/geography/state_province_region/iso_3166_2_state_code_s. For all countries use the ISO 3166-1 two-letter country codes found at http://www.iso.org/iso/country_names_and_code_elements.

8. Telephone Numbers: Record all telephone numbers, both foreign and domestic, as a single number string without formatting or special characters such as parentheses or hyphens. For example, a number in the format (NNN) NNN-NNNN would be recorded as NNNNNNNNNN. Indicate the type of telephone number provided (home, work, mobile, or fax) by checking the appropriate box. Provide the telephone extension number if known. Telephone numbers that are part of the North American Numbering Plan used by the U.S., Canada, many Caribbean countries, and current/former U.S. Pacific island protectorates must consist of an area code and seven-digit telephone number. Other foreign telephone numbers

should include the country number code. If only a partial telephone number is known record that number in the phone number item and explain in Part V that the entry is a partial number.

9. Identifying Numbers: Enter all identifying numbers as a single text string without formatting or special characters such as hyphens or periods. An identifying number in the format NNN-NN-NNNN would be entered as NNNNNNNNNN. Such numbers include account numbers, alien registration numbers, CRD, CUSIP®, driver's license numbers, state identifications, EINs, IARDs ITINs, passport numbers, RSSDs, SEC IDs, and SSNs.

10. Monetary Amounts: Record all monetary amounts in U.S. Dollars rounded up to the next whole dollar. The amount \$5,265.25 would be recorded as \$5,266. If the amount involves a foreign currency, record the currency name, amount, and country of origin in Part V. When converting a foreign currency to U.S. Dollars use an exchange rate for the date or dates the foreign currency was involved in the suspicious activity.

11. Prohibited Words and Phrases: Do not use the following words or variations of these words in text fields, other than in Part V:

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

12. Name Editing Instructions: Because many names do not consist of a single first name, middle name, and last name, care must be taken to ensure these names are entered properly in the BSA SAR. This is especially important when there are separate fields for the last name, first name, and middle name. Some names have multiple surnames (family names) or multiple given names that do not include a middle name. Others may not be written in [first name] [middle name] [last name] order. Multiple surnames must be entered in the last name field. For

example, Hispanic names may be written in the order of given name, father's last name, and mother's last name, e.g., "Juan Vega Santiago." Thus the surname "VEGA SANTIAGO" would be entered in the last name field with "JUAN" entered in the first name field. Some Hispanic surnames consist of three names (e.g., father's last name, mother's last name, and husband's father's last name in the case of a married woman). In that case all three would be entered in a last name field. Hispanic names do not have middle names, so a multiple Hispanic given name such as "Rosa Maria" would be recorded in the first name field. In some cultures names consist of multiple first names and a single family name, not necessarily in (first name) (last name) order. For example, the Korean name "Kim, Chun Nam" consists of the family name "Kim" and the first name "Chun Nam" separated by a comma and space. There is no middle name. In this case "KIM" would be entered in the last name field and "CHUN NAM" would be entered in the first name field. Nothing is entered in the middle name field. When an individual name is entered in a single name field it should be entered in [first name] [middle name] [last name] order regardless of any foreign naming conventions. Thus, "Kim, Chun Nam" would be entered as "CHUN NAM KIM" in a single name field. Punctuation and special characters should be used in names only when they are part of the name. For example, the period in "Expedia.Com" should be included because it is part of the name. Placing a period after a middle initial would be prohibited because the period is not part of the middle name. Abbreviations in names are prohibited unless an abbreviation is part of a legal name. Entry of middle initials is permitted when a middle name is unknown. A name suffix may be abbreviated, i.e. Junior can be JR, Senior can be SR, the Third can be III, etc.

Item Instructions

NOTE: Critical fields are identified with the * symbol in front of the data element number.

----- Type of Filing -----

- * 1. Check all that apply:
- a. Initial report
 - b. Correct/Amend prior report
 - c. Continuing activity report
 - d. Joint report
 - e. Prior report Document Control Number/BSA Identifier if items 1b or 1c are checked

Item *1 Type of Filing: Check box 1a "Initial report" if this is the first report filed on the suspicious activity. FinCEN SARs filed as a result of a historical or other review of past transactional activity, either directed by a regulating authority or conducted as a financial institution initiative, must always be initial reports. Check box 1b "Correct/Amend prior report" if the report corrects or amends a previously-filed report. Check box 1c "Continuing activity report" if this report involves suspicious activity reported on one or more previous reports. Continuing reports should be filed at least every 90 days on continuing suspicious activity. If this report is being jointly filed with another financial institution, check the appropriate box 1a, 1b, or 1c and box 1d "Joint report." Filers must clearly identify in Part V which Part III financial

institutions are the joint filers on the FinCEN SAR. If box 1b or 1c is checked, enter in field 1e the Document Control Number (DCN) or the BSA Identifier (BSA ID) assigned to the previous SAR by FinCEN. If the DCN or BSA ID is unknown, enter zeros in place of the unknown number. See General Instructions 3 through 5 for additional information on Type of Filing.

----- Part I: Subject Information -----

Part I Subject Information: Complete a Part I section on each known subject involved in the suspicious activity. Persons who are victims of the suspicious activity are not subjects and should not be recorded in a Part I section. Victim information, if necessary for a complete description of the suspicious activity, should be recorded in Part V. If the subject is or all subjects are unknown, complete a single Part I record with box 2b checked to show that all subject information was unavailable for critical Items 3, 4, 8, 9, 10, 11, 12, 13, 15, and 16. These critical items (denoted with an asterisk “*”) except Item 24 must be blank. Record the nature of the unknown subject(s) in Part V. If the suspicious activity involves known and unknown subjects, complete a Part I section on each known subject and record the nature of the unknown subject(s) in Part V. Do not complete Part I records on the unknown subjects when there are known subjects.

2. Check:

- a. if entity
- b. if all critical* subject information is unavailable (does not include item 24)

Item 2a Check if entity: Check box 2a if the person described in Part I is an entity and not an individual.

Item 2b Check if all critical subject information is unavailable: Check box 2b if the information in Part I is unavailable for all critical subject items except Item 24. These critical items (3, 4, 8, 9, 10, 11, 12, 13, 15, and 16) and their associated “Unknown” fields must be left blank.

* 3. Individual’s last name or entity’s legal name

- a. (check if) unknown

Item *3 Individual's last name or entity's legal name: Enter the individual's last name or the entity's legal name. The legal name is the name on the articles of incorporation or other document that established the entity. Do not abbreviate names unless an abbreviation is part of the legal name. Item 3 and box 3 “Unknown” must be blank if box 2b is checked. Leave item 3 blank and check box 3 “Unknown” if the individual's last name or the entity's legal name is unknown and box 2b is not checked.

* 4. First name

- a. (check if) unknown

Item *4 First name: Enter the individual's first name. If the first name is unknown leave item 4 blank and check box 4 "Unknown." Leave Item 4 and box 4 "Unknown" blank if box 2a or 2b is checked.

5. Middle name/initial

Item 5 Middle name/initial: Enter the individual's middle name or initial. Leave this item blank if the middle name or initial is unknown or box 2a is checked.

5. Suffix name

Item 5 Suffix name: Enter the individual's suffix such as JR, SR, III, etc. Leave this item blank if the suffix is unknown or the individual's legal name does not include a suffix.

5. Gender

- a. (Check if) Male
- b. (Check if) Female
- c. (Check if) Unknown

Item 5 Gender: Select options 5a Male or 5b Female if individual's gender is known. Select option 5c "Unknown" if the individual's gender is unknown. Leave Item 5 blank if the subject is an entity. Item 5 (Gender) does not create an obligation for a financial institution to collect this data when such collection would be in conflict with the financial institution's obligations under any other federal law.

6. Alternate name, e.g. AKA - Individual or DBA - Entity

Item 6 Alternate name: Enter the individual's also known as (AKA) name or the entity's doing business as (DBA) name if different from the name entered in Items 3-5. Do not include the acronyms AKA or DBA with the name. Multiple Item 6 fields may be completed if multiple subject alternate names are known.

7. Occupation or type of business

- a. NAICS Code

Item 7 Occupation or type of business: Record the occupation, profession, or type of business of the individual or entity recorded in Part I. Use specific descriptions such as doctor, carpenter, attorney, used car dealership, plumber, truck driver, hardware store, etc. Do not use non-descriptive items such as businessman, merchant, retailer, retired, or self-employed. If words like self-employed, unemployed, or retired are used, add the current or former profession if known (e.g. self-employed building contractor, retired teacher, or unemployed carpenter). If the occupation or business activity can be described in more detail, include the additional information in Part V.

Item 7a NAICS Code: Select from the FinCEN-approved list the North American Industry Classification System (NAICS) code for the occupation or type of business entered in Item 7. Access the NAICS Code list from the BSA E-Filing Web Site (<http://bsaefiling.fincen.treas.gov/main.html>).

* 8. Address

- a. *(check if)* unknown

Items *8 - *12 Subject address items: Enter the subject's permanent street address, city, two or three letter state/territory/province code (U.S./Canada/Mexico only), ZIP Code or foreign postal code, and two letter country code. Complete any address item that is known, even if the complete address is unknown. If an address item is unknown, leave that item blank and check box 8 "Unknown." If box 2b is checked all address items and check boxes must be blank. See General Instruction 7 for additional information on entering addresses. Multiple sets of address fields may be completed if multiple present and past subject addresses are known.

* 9. City

- a. *(check if)* unknown

* 10. State

- a. *(check if)* unknown

* 11. ZIP/Postal Code

- a. *(check if)* unknown

* 12. Country Code

- a. *(check if)* unknown

* 13. TIN *(enter number in space provided and check appropriate type below)*

- a. *(check if)* unknown

Item *13 TIN: Enter the subject's U.S. taxpayer identification number (TIN) or foreign equivalent without formatting or punctuation. If the number is unknown, check box 13 "Unknown" and leave Item 13 blank. Leave item 13 and box 13 "Unknown" blank if box 2b is checked. See General Instruction 9 for information on entering identifying numbers.

14. TIN type

- a. EIN
b. SSN-ITIN
c. Foreign

Item 14 TIN type: Identify the type of TIN recorded in Item 13. Select option 14a "EIN" if the subject has a U.S. Employer Identification Number (EIN). Box 2a "If entity" must be checked because an EIN is assigned only to an entity. Select option 14b "SSN-ITIN" if the subject has a U.S. Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN). Select option 14c "Foreign" if the subject has a foreign TIN of any type. Box 2a must be checked if the foreign subject is an entity. If 14c is checked, record in Part V the name of the country that issued the foreign TIN. Enter the subject's TIN type if known even if the actual TIN is unknown and Item 13 "Unknown" is checked. If a 9-digit TIN is entered in Item 13 but the TIN type is unknown, select option 14a "EIN" if the subject is an entity and option 14b "SSN-ITIN" if the subject is an individual. TINs that are not 9 digits are presumed to be foreign, so option 14c "Foreign" would be selected.

* 15. Form of identification for subject:

- a. *(check if)* Unknown
- b. *(check if)* Driver's license/state ID
- c. *(check if)* Passport
- d. *(check if)* Alien registration
- e. Number
- f. Issuing State
- g. Issuing Country
- z. *(check if)* Other *(and specify type in space provided)*

Item *15 Form of identification: Enter in Item 15 the information used to identify the individual or entity. Select option 15b if the identification was a driver's license or state ID, 15c if the identification was a passport or 15d if the identification was an alien registration. Select option 15z if a different identification was provided and describe that identification in the "Other" text field. "Other" identification could include such things as an entity's business license or incorporation documents, corporate ID cards, local government ID cards, etc. Enter the identification number in field 15e "Number." Do not include formatting such as hyphens or periods. Select the appropriate state option in field 15f "Issuing state" if the identification issuer was a U.S., Canadian, or Mexican state, territory, or province. Select the appropriate country option in field 15f "Country" if the issuer was a country. If field 15f "Issuing state" contains an entry, then 15g "Country" must contain "US," "CA," or "MX" as appropriate. See General Instruction 7 for information about the codes to enter in state and country items. If the identification issuer does not have a code, select the option for the issuer's country in field 15g. For example, if the issuer was the London Police Department United Kingdom would be selected in 15g. Record the name and nature of the issuer in Part V. Enter all identification data that is available. Check box 15a "Unknown" only if all identification information is unknown but the subject is known. Leave all fields in Item 15 blank if box 2b has been checked. Multiple sets of Item 15 fields may be completed if multiple types of identification for a subject are known. See General Instruction 9 for information on entering identifying numbers.

* 16. Date of birth

a. *(check if)* unknown

Item *16 Date of birth: If the subject is an individual enter the subject's data of birth in Item 16. Filers of FinCEN's discrete FinCEN SAR must use the format MM/DD/CCYY where MM = month, DD = day, CC = century, and YY = year. Batch filers must use the format MMDDCCYY. If the birth day and or month is unknown, enter "00" for the unknown day or month. For example, a date of birth with an unknown day in February 1978 would be entered as 02/00/1978 in a discrete FinCEN SAR and 02001978 in a batch filed FinCEN SAR. Do not enter zeros for the year if the year is unknown. If the year of birth or the complete date of birth is unknown, check box 16 "Unknown" and leave Item 16 blank. If box 2a or 2b is checked, Item 16 and box 16 "Unknown" must be blank.

17. Phone number – type

- a. *(check if)* Home
- b. *(check if)* Work
- c. *(check if)* Mobile
- d. *(check if)* Fax

Item 17 Phone number - type: Enter the type of telephone number recorded in Item 18 by selecting the appropriate option. Leave Item 17 blank if no telephone number is recorded in Item 18 or the type of telephone number is unknown. Multiple sets of Item 17 and Item 18 fields may be completed if multiple telephone numbers for the subject are known.

18. Phone number

- a. Extension (if any)

Item 18 Phone number: Enter the subject's U.S. or foreign telephone number with no formatting such as parentheses, spaces, or hyphens. If the telephone number is unknown, leave item 18 blank. See General Instruction 8 for information on entering telephone numbers. Multiple sets of Item 17 and Item 18 fields may be completed if multiple telephone numbers for the subject are known.

Item 18a Ext. (if any): Enter the telephone extension associated with the subject's telephone number. Leave Item 18a blank if there is no extension or the extension is unknown.

19. E-mail address (if available)

Item 19 E-mail address: Enter the subject's e-mail address if known. Include all formatting, punctuation, and special characters in the e-mail address. Leave Item 19 blank if the e-mail address is unknown. If additional e-mail addresses are known for a subject, complete additional Item 19 fields. An e-mail address must contain the "@" sign and a period in the text following the "@" sign. Examples: johndoe@business.com or richardroephd@college.edu.

19a. Website (URL) address (if available))

Item 19a Website (URL) address: Enter the subject's website URL (Uniform Resource Locator) known. Include all punctuation and special characters present in the URL. If additional URLs are known for a subject, complete an additional Item 19a for each URL. Leave Item 19a blank if the URL is unknown.

20. Corroborative statement to filer?

- a. *(check if)* Yes
- b. *(check if)* No

Item 20 Corroborative statement: Select "Yes" if the subject has made a statement to the filer admitting to involvement in or otherwise substantiating the suspicious activity. Record in Part V the nature of the corroborative statement and how it was recorded, i.e. written confession, verbal statement, etc. Select "No" if no corroborative statement was made to the filer.

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

- a. Institution TIN
- b. Accountant
- c. Agent
- d. Appraiser
- e. Attorney
- f. Borrower
- g. Customer
- h. Director
- i. Employee
- j. No relationship to institution
- k. Officer
- l. Owner or Controlling Shareholder
- z. Other *(specify type in space provided)*

Item 21 Relationship of the subject to an institution: If the subject has a relationship with a financial institution or individual listed in Part III or Part IV, enter the financial institution's TIN from Items 55 or 80 in field 21a "Institution EIN." Select all options 21b through 21l that describe the relationship. If the relationship is not covered by any of options 21b through 21l, select option 21z "Other" and enter a brief description of the relationship in the "Other" text field. Avoid descriptions that are too general. For example, the entry "broker" should be made more specific by indicating the relationship was "real estate broker," "securities broker," or "mortgage broker." If necessary, describe the relationship more fully in Part V. If the subject has no relationship with the financial institution, check box 21j "No relationship to institution." The FinCEN SAR cannot be a joint FinCEN SAR if any of the options 21h "Director," 21i "Employee," 21k "Officer," or 21l "Owner or Controlling Shareholder" have been selected. If the subject had a relationship with a financial institution recorded in Part III but the financial

institution's TIN was unknown, record the relationship but leave field 21a blank. If the subject has relationships with multiple Part III and Part IV financial institutions, complete a separate set of Item 21 fields for each financial institution. If more than one of 21h "Director," 21i "Employee," 21k "Officer," or 21l "Owner or Controlling Shareholder" is selected and/or the status or action date is different for each, an Item 21 for each must be completed.

22. If item 21h, i, k, or l is selected, indicate status of relationship

- a. *(check if)* Relationship continues
- b. *(check if)* Terminated
- c. *(check if)* Suspended/barred
- d. *(check if)* Resigned

Item 22 If item 21h, i, k, or l is selected: If any of boxes 21h, 21i, 21k, or 21l are selected, select the appropriate Item 22 option to indicate the status of the relationship. Select option 22a if the relationship continues. Select option 22b if the subject was terminated, 22c if the subject was suspended or barred, or 22d if the subject resigned. If multiple sets of Item 21 fields are completed on a subject, complete an Item 22 field for each set.

23. Action date if 22 b, c, or d is checked

Item 23 Action date: If any of boxes 22b through 22d have been checked, enter the date the action was taken. The date must be in MM/DD/YYYY format. Leave Item 23 blank if no action was taken. If multiple Item 22 fields were created where box 22b, 22c, or 22d was checked, complete an Item 23 for each Item 22.

* 24. Financial Institution TIN and account number(s) affected that are related to subject, if any.

- a. *(check if)* No known account involved
- b. *(check if)* Non-US Financial Institution
- c. TIN
- d. account number
- e. *(check if)* closed

Item 24 Financial inst. EIN and acct. number(s) affected that are related to the subject, if any: Enter in Item 24 information about any accounts involved in the suspicious activity that are related to the subject recorded in Part I. Enter account numbers without formatting or special characters such as spaces, hyphens, or periods. See General Instruction 9 for information about entering account numbers in fields. An account is related to a subject if the subject owns the account, has control over the account, or conducted activity in or through an account the subject does not own or control. Check box 24a "No known acct. involved" if no account related to the subject is involved in the suspicious activity. Check box 24b "Non-US Financial Institution" if the account is located at a foreign financial institution. Enter in field 24c the TIN, if known, of the financial institution where the account is held. If the TIN is unknown leave the TIN field blank. Enter the account number involved in field 24d. If the account is closed, check the "Yes"

box. If multiple account numbers are involved in the suspicious activity, complete an additional set of account number fields for each account number. Record account numbers involved in the suspicious activity that are related to the subject even if the TIN or name of the financial institution is unknown. If the TIN of a financial institution associated with an account number entered in 24d is unknown, record the institution name and associated account number in Part V (example: "The account number 123654987 is held at First Federal Bank."). If the filer is aware that the subject has an account involved in the suspicious activity with a financial institution listed in Part III but the account number is unknown, record the financial institution TIN in Item 24a but leave the associated account number field blank. Explain the missing account number in Part V. The subject's relationship to any account recorded in Item 24 must be clearly defined in Part V unless the subject is the owner of the account (example: "The subject made unauthorized purchases using a stolen debit card for account 3456789 owned by his aunt.").

25. Subject's role in suspicious activity (if applicable)

- a. *(check if)* Purchaser/Sender
- b. *(check if)* Payee/Receiver
- c. *(check if)* Both a & b

Item 25 Subject's role: Record the subject's role in the suspicious activity by selecting the appropriate option. Select option 25a "Purchaser/Sender" if the subject purchased or sent the financial instrument(s) or product(s) involved in the suspicious activity. Select option 25b "Payee/Receiver" if the subject was the payee or receiver of the instrument(s) or product(s). Select option 25c "Both a & b" if the subject was both a purchaser/sender and payee/receiver. Instruments and products are not limited to the instruments and products listed in Item 39 and 40.

----- Part II Suspicious Activity Information -----

* 26. Amount involved in this report

- a. *(check if)* Amount unknown
- b. *(check if)* No amount involved

Item *26 Amount involved in this report: Enter the total dollar amount involved in the suspicious activity for the time period of this report. If the amount is unknown, leave this item blank and check box 26a "Amount unknown." Explain why the dollar amount is unknown in Part V. If some dollar amounts are known while others are unknown, enter the total of all known amounts and explain the unknown amounts in Part V. If there is no amount involved in the suspicious activity, check box 26b "No amount involved." If the FinCEN SAR is a continuing report with box 1c "Continuing activity report" checked, enter only the amount involved for the time period covered by this FinCEN SAR. Do not include amounts from prior FinCEN SARs in Item 26. See General Instruction 10 for information on entering amounts.

* 27. Date or date range of suspicious activity for this report

- a. From: mm/dd/yyyy
- b. To: mm/dd/yyyy

Item *27 Date or date range of suspicious activity for this report: Enter the suspicious activity date or date range for this report. If the suspicious activity occurred on a single day, enter that date in field 27a "From" and leave field 27b "To" blank. If the suspicious activity occurred on multiple days, enter the earliest date of suspicious activity in field 27a and the most-recent date of suspicious activity in field 27b. If the exact date(s) of the suspicious activity is (are) unknown, enter a date range that the filer believes will encompass the date(s) of the suspicious activity. Explain the nature of this date range in Part V. If the FinCEN SAR involves continuing activity with box 1c "Continuing activity report" checked, enter only the date range covered by this FinCEN SAR. Record in Part V the aggregated date range of all FinCEN SARs filed on the continuing suspicious activity. Use the format MM/DD/CCYY for dates in a discrete FinCEN SAR and the format MMDDCCYY for dates in a batch-filed FinCEN SAR.

28. Cumulative amount only if box 1c (continuing activity report) is checked

Item 28 Cumulative amount: Enter the cumulative amount involved in the suspicious activity in Item 28 if box 1c "Continuing activity report" is checked. The cumulative amount represents the total amount involved in all FinCEN SARs filed on the suspicious activity, including the current FinCEN SAR. If box 1c is checked and the cumulative dollar amount is unknown because all dollar amounts are unknown or no dollar amount is involved, enter zero (0) and explain the entry in Part V. If some dollar amounts are known while others are unknown, enter the total of all known amounts in Item 28 and explain the nature of the unknown amounts in Part V. See General Instruction 10 for information on entering amounts. Leave Item 28 blank if box 1c is not checked.

Items 29-38 Types of suspicious activity: Use the suspicious activity category Items 29 through 38 to record the type(s) of suspicious activity being reported. Check all boxes that apply to the suspicious activity. If a category applies but none of the options apply, check the category's box "z Other" and briefly describe the type of suspicious activity in the associated text field. If necessary, explain the type of suspicious activity in more detail in Part V.

29. Structuring

- a. Alters transaction to avoid BSA recordkeeping requirement
- b. Alters transaction to avoid CTR requirement
- c. Customer cancels transaction to avoid BSA reporting and recordkeeping requirements
- d. Multiple transactions below BSA recordkeeping threshold
- e. Multiple transactions below CTR threshold
- f. Suspicious inquiry by customer regarding BSA reporting or recordkeeping requirements
- z. Other (*specify type of suspicious activity in space provided*)

- 30. Terrorist Financing
 - a. Known or suspected terrorist / terrorist organization
 - z. Other (*specify type of suspicious activity in space provided*)

- 31. Fraud
 - a. ACH
 - b. Business loan
 - c. Check
 - d. Consumer loan
 - e. Credit/Debit card
 - f. Healthcare
 - g. Mail
 - h. Mass-marketing
 - i. Pyramid scheme
 - j. Wire
 - z. Other (*specify type of suspicious activity in space provided*)

- 32. Casinos
 - a. Inquiry about end of business day
 - b. Minimal gaming with large transactions
 - c. Suspicious intra-casino funds transfers
 - d. Suspicious use of counter checks or markers
 - z. Other (*specify type of suspicious activity in space provided*)

- 33. Money laundering
 - a. Exchanges small bills for large bills or vice versa
 - b. Suspicion concerning the physical condition of funds
 - c. Suspicion concerning the source of funds
 - d. Suspicious designation of beneficiaries, assignees or joint owners
 - e. Suspicious EFT/Wire transfers
 - f. Suspicious exchange of currencies
 - g. Suspicious receipt of government payments/benefits
 - h. Suspicious use of multiple accounts
 - i. Suspicious use of noncash monetary instruments
 - j. Suspicious use of third-party transactors (straw-man)
 - k. Trade Based Money Laundering / Black Market Peso Exchange
 - l. Transaction out of pattern for customer(s)
 - z. Other (*specify type of suspicious activity in space provided*)

- 34. Identification / Documentation
 - a. Changes spelling or arrangement of name
 - b. Multiple individuals with same or similar identities
 - c. Provided questionable or false documentation

- d. Refused or avoided request for documentation
 - e. Single individual with multiple identities
 - z. Other (*specify type of suspicious activity in space provided*)
35. Other suspicious activities
- a. Account takeover
 - b. Bribery or gratuity
 - c. Counterfeit instruments
 - d. Elder financial exploitation
 - e. Embezzlement/theft/disappearance of funds
 - f. Forgeries
 - g. Identity theft
 - h. Little or no concern for product performance penalties, fees, or tax consequences
 - i. Misuse of “free look”/cooling off/right of rescission
 - j. Misuse of position or self-dealing
 - k. Suspected public/private corruption (domestic)
 - l. Suspected public/private corruption (foreign)
 - m. Suspicious use of informal value transfer system
 - n. Suspicious use of multiple transaction locations
 - o. Transaction with no apparent economic, business, or lawful purpose
 - p. Two or more individuals working together
 - q. Unauthorized electronic intrusion
 - r. Unlicensed or unregistered MSB
 - z. Other (*specify type of suspicious activity in space provided*)
36. Insurance
- a. Excessive insurance
 - b. Excessive or unusual cash borrowing against policy/annuity
 - c. Proceeds sent to or received from unrelated third party
 - d. Suspicious life settlement sales insurance (e.g. STOLI’s, Viaticals)
 - e. Suspicious termination of policy or contract
 - f. Unclear or no insurable interest
 - z. Other (*specify type of suspicious activity in space provided*)
37. Securities / Futures / Options
- a. Insider trading
 - b. Market manipulation/wash trading
 - c. Misappropriation
 - d. Unauthorized pooling
 - z. Other (*specify type of suspicious activity in space provided*)
38. Mortgage fraud
- a. Appraisal fraud

- b. Foreclosure fraud
- c. Loan modification fraud
- d. Reverse mortgage fraud
- z. Other

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

- a. Bonds/Notes
- b. Commercial mortgage
- c. Commercial paper
- d. Credit card
- e. Debit card
- f. Forex transactions
- g. Futures/Options on futures
- h. Hedge fund
- i. Home equity loan
- j. Home equity line of credit
- k. Insurance/Annuity products
- l. Mutual fund
- m. Options on securities
- n. Penny stocks/Microcap securities
- o. Prepaid access
- p. Residential mortgage
- q. Security futures products
- r. Stocks
- s. Swap, hybrid or other derivative
- z. Other (*specify type in space provided*)

Item 39 Product types involved in suspicious activity: Check all Item 39 boxes that apply to record the product type(s) involved in the suspicious activity. Option 39f ‘Forex transactions’ includes all foreign exchange transactions both on and off-exchange, including futures and options on foreign exchange. Option 39g ‘Futures/Options on futures’ includes futures and options on any ‘commodity,’ as that term is defined in Section 1a(4) of the Commodity Exchange Act, including broad-based security indexes. Option 39s ‘Swap, hybrid or other derivative’ includes all derivatives not included above including those traded over-the-counter and off-exchange. If the product type is not covered by options 39a through 39s, check box 39z ‘Other (list below)’ and enter a brief description in the associated text field. If necessary provide a more detailed product type (such as commodity futures contracts, options on commodity futures contracts, commodity options, and OTC agricultural trade options) in Item 42 ‘Product/instrument description’ or in Part V. If there are multiple product types not covered by Item 39, record one in Item 39 ‘Other (List below)’ and all others in Part V.

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

- a. Bank/cashier's check
- b. Foreign currency
- c. Funds transfer
- d. Gaming instruments
- e. Government payment
- f. Money orders
- g. Personal/Business check
- h. Travelers checks
- i. U.S. Currency
- z. Other (*specify type in space provided*)

Item 40 Instrument types involved in suspicious activity: Check all Item 40 boxes that apply to record the instrument type(s) involved in the suspicious activity. If the instrument type is not covered by options 40a through 40i, check box 40z "Other (List below)" and enter a brief description in the associated text field. If necessary provide a more-detailed description of the instrument type in Part V. If there are multiple instrument types not covered by Item 40, record one in Item 40 "Other (List below)" and all others in Part V.

41. Commodity type (if applicable)

Item 41 Commodity type: If a commodity is involved in the suspicious activity, record the commodity type in Item 41. Multiple Item 41 fields should be completed if multiple commodity types are involved in the suspicious activity.

42. Product/Instrument description (if needed)

Item 42 Product description: Provide a description of the product recorded in Item 39 or instrument recorded in Item 40 if necessary for a more-complete understanding of the suspicious activity. Multiple Item 42 fields should be completed if multiple products or instruments requiring a description are involved in the suspicious activity.

43. Market where traded (*list of codes will be provided – dropdown menu for electronic filers*)

Item 43 Market where traded: Enter in Item 43 the three to five-letter code for the market where a commodity recorded in Items 39 or 41 was traded. Multiple Item 43 fields should be completed if multiple markets are involved in the suspicious activity. Use only the ISO 10383 Exchange/Market Identifier Codes (MIC) found at <http://www.iso15022.org/MIC/homepageMIC.htm>.

44. IP Address (if available)

Item 44 IP Address: Enter the Internet Protocol (IP) Address, if known, of a computer involved in the suspicious activity. Enter as many IP addresses as are known up to a maximum of 99. If the IP address is IPv4, use a variation of the format nnn.nnn.nnn.nnn (n = number) with periods between the segments. If the IP address is IPv6, use a variation of the format cccc:cccc:cccc:cccc:cccc:cccc:cccc:cccc (c = character, IPv6 is alphanumeric in some segments) with colons between the segments. Left justify and space-fill the entry. Multiple Item 44 fields should be completed if multiple IP addresses are involved in the suspicious activity.

45. CUSIP number

Item 45 CUSIP® number: Enter in Item 45 the CUSIP® (Committee on Uniform Securities Identification Procedures) number of any securities products such as stocks and bonds involved in the suspicious activity. Multiple Item 45 fields should be completed if there are multiple CUSIP numbers for multiple securities products involved in the suspicious activity.

----- Part III Information about Financial Institution Where Activity Occurred -----

Part III records information about the financial institution(s) where the suspicious activity occurred. Complete a separate Part III record on each financial institution involved in the suspicious activity. If box 1d "Joint report" is checked there must be two or more Part III records in the FinCEN SAR, one for the Part IV filing institution or filer subsidiary and one for each joint filer. If a financial institution recorded in Part III has branches involved in the suspicious activity, record the branch information in Items 64 through 70. Information on up to 99 branches can be recorded in a single SAR. A branch is a location (such as an office or ATM) owned by the financial institution but located separately from the financial institution's headquarters. If a reporting financial institution has agents where the suspicious activity occurred, a separate Part III must be prepared on each agent. An agent is an independent financial institution (such as a supermarket that sells money orders or an independent insurance agent) that has a contractual relationship with the reporting financial institution to conduct financial transactions. Do not place agent information in branch fields. Generally, a branch operates under the same TIN as the financial institution. An agent has a TIN different from the financial institution. Financial institution as used in Part III includes individuals acting as sole proprietorship financial institutions using their personal Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN).

* 47. Type of financial institution (check only one)

- a. Casino/Card club
- b. Depository institution
- c. Insurance company
- d. MSB
- e. Securities/Futures
- f. Loan or Finance Company
- g. Housing GSE

z. Other (*specify type of institution in space provided*)

Item *47 - Type of financial institution: Select the appropriate type of financial institution that best describes the financial institution recorded in Item 53. If none of those options apply, select "Other" and enter a brief description in the associated text field. If necessary, include a more-detailed description in Part V.

NOTE: If the financial institution is a non-bank residential mortgage lender or originator, select "Other" and enter "NON-BANK RESIDENTIAL MORTGAGE" in the associated text field. If the financial institution is a dealer in precious metals, stones, or jewels, select option "Other" and enter "DEALER IN PRECIOUS METALS STONES JEWELS" in the associated text field.

* 48. Primary Federal Regulator

- a. Commodities Futures Trading Commission (CFTC)
- b. Federal Reserve Board (FRB)
- c. Federal Deposit Insurance Corporation (FDIC)
- d. Internal Revenue Service (IRS)
- e. National Credit Union Administration (NCUA)
- f. Office of the Comptroller of the Currency (OCC)
- g. Securities and Exchange Commission (SEC)
- h. Federal Housing Finance Agency (FHFA)
- z. Not Applicable.

Item *48 Primary federal regulator: Select the appropriate option to identify the primary federal regulator or BSA examiner of the financial institution recorded in Part III. If more than one regulator option could apply, enter the code for the regulator that has primary responsibility for enforcing compliance with the BSA. If Item 47 option "Casino/Card Club," "Insurance Company," or "MSB" was selected, the Item 48 entry must be "Internal Revenue Service (IRS)." If the institution recorded in Part III is subject to U.S. law and none of the other codes apply, select option "Internal Revenue Service (IRS)." If the institution recorded in Part III is not subject to U.S. law, then select option "Not Applicable."

49. If item 47a is checked indicate type (Check only one)

- a. State licensed casino
- b. Tribal authorized casino
- c. Card club
- z. Other (*specify type in the space provided*)

Item 49 Gaming institution type: If option 47a was selected indicating the financial institution is a gaming institution such as a casino or card club, record the type of gaming institution by checking the appropriate box. If none of the options 49a through 49c are appropriate, check box

49z "Other" and provide a brief description in the associated text field. If necessary, include a more detailed description in Part V.

50. If item 47e is checked, indicate type of Securities and Futures institution or individual where activity occurred—check box(es) for functions that apply to this report

- a. Clearing broker - securities
- b. Futures Commission Merchant
- c. Holding company
- d. Introducing broker - commodities
- e. Introducing broker - securities
- f. Investment Adviser
- g. Investment company
- h. Retail foreign exchange dealer
- i. Subsidiary of financial/bank holding company
- z. Other (*specify type of institution or individual in space provided*)

Item 50 Securities and futures type: If option 47e was checked indicating the financial institution is part of the securities and futures industries, check all boxes that apply to indicate the type of securities and futures institution. If none of options 50a through 50i apply, check box 50z "Other" and record a brief description of the type in the associated text field. Examples of this are commodity pool operator or commodity trading adviser. If necessary, include a more-detailed description in Part V.

51. Financial institution identification number (Check one box to indicate type)

- a. (*check if*) Central Registration Depository (CRD) number
- b. (*check if*) Investment Adviser Registration Depository (IARD) number
- c. (*check if*) National Futures Association (NFA) number
- d. (*check if*) Research Statistics Supervision Discount (RSSD) number
- e. (*check if*) Securities and Exchange Commission (SEC) number
- f. (*check if*) National Association of Insurance Commissioners (NAIC Code)
- g. (*check if*) Mortgage (NMLS ID)
- h. Identification number

Item 51 Financial institution identification number: Select the appropriate option if the financial institution recorded in Part III has a Central Registration Depository (CRD) number, an Investment Adviser Registration Depository (IARD) number, a National Futures Association (NFA) number, a Research Statistics Supervision Discount (RSSD) number, or a Securities and Exchange Commission (SEC) Reporting File Number (RFN). Do not enter an SEC Central Index Key (CIK) number in place of the RFN. Record the number in field 51h. See General Instruction 9 for information on entering identifying numbers.

52. Financial institution's role in transaction (if applicable)

- a. (*check if*) Selling location

- b. *(check if)* Paying location
- c. *(check if)* Both a & b

Item 52 Financial institution role in transaction: Check the box "Selling location" if the customer purchased at the Part III financial institution the products or instruments recorded in Items 39 or 40. Check the box "Paying location" if the customer received payment from the Part III financial institution for the products or instruments recorded in Items 39 or 40. Check the box "Both" if the Part III financial institution was both a paying and selling location for the products or instruments recorded in Items 39 or 40.

- * 53. Legal name of financial institution
 - a. *(check if)* unknown

Item 53 Legal name of financial institution: Enter the legal name of the financial institution as recorded on articles of incorporation or other documents establishing the institution. Enter the full name of the filer if the filer is an individual, such as a sole proprietorship, acting as a financial institution. If an individual's name is recorded, enter the name in (first name) (middle name) (last name) or equivalent format, e.g. John Jacob Doe or Richard R. Roe II, etc. Check box 53 "Unknown" if the legal name is unknown and leave Item 53 blank.

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

Item 54 Alternate name: If the financial institution recorded in Item 53 has a separate doing business as (DBA) name, enter that name here. If an individual recorded in Item 53 has a separate also known as (AKA) name, enter that name here also. Do not include the acronyms DBA or AKA with the alternate name.

- * 55. TIN
 - a. *(check if)* unknown

Item 55 - TIN: Enter the Taxpayer Identification Number (TIN), either U.S. or foreign, of the financial institution or individual recorded in Item 53. See General Instruction 9 for information on entering identifying numbers. Check box 55 "Unknown" if the TIN is unknown and leave Item 55 blank.

- 56. TIN type (* if 55 is completed)
 - a. EIN
 - b. SSN-ITIN
 - c. Foreign

Item 56 TIN type: Select the option for the type of TIN entered in Item. If the TIN in Item 55 is unknown and the Item 53 financial institution has a U.S. address, select TIN Type option "EIN" if the financial institution is an entity and "SSN-ITIN" if the financial institution is an

individual. If the financial institution has a foreign address and the TIN is unknown, select "Foreign."

* 57. Address

a. *(check if)* unknown

Items *57 - *61 Financial institution address items: Enter the financial institution's permanent street address, city, two or three letter state/territory/province code (U.S./Canada/Mexico only), ZIP Code or foreign postal code, and two letter country code. If an address item is unknown, leave that item blank and check the item's "Unknown" box. Leave Item 59 State blank if the state is unknown or the country is not the U.S., Canada, or Mexico. See General Instruction 7 for additional information on entering address data.

* 58. City

a. *(check if)* unknown

59. State

* 60. ZIP/Postal Code

a. *(check if)* unknown

* 61. Country

62. Internal control/file number

Item 62 Internal control/file number: Enter the internal control number or file number, if applicable, assigned to the FinCEN SAR by the financial institution. This number should be unique to the FinCEN SAR if possible, allowing interested parties such as law enforcement or the financial institution to reference the FinCEN SAR without committing a potentially illegal disclosure of FinCEN SAR data.

63. Loss to financial institution *(if applicable)*

Item 63 Loss to financial institution: If the financial institution has suffered a loss because of the suspicious activity, record the amount of loss in Item 63. If some losses are known and other losses unknown, enter the total of known losses as of the date of filing. If the FinCEN SAR is a continuing FinCEN SAR because box 1c was checked, enter the loss amount for the current FinCEN SAR in Item 63 and record in Part V the total aggregated losses for all FinCEN SARs filed on the suspicious activity. The amount entered in this field cannot be zero and cannot be greater than the amount in Item 26 "Amount involved in this report." See General Instruction 10 for information on entering amounts.

64. Branch's role in transaction *(if applicable)*

- a. *(check if)* Selling location
- b. *(check if)* Paying location
- c. *(check if)* Both a & b

Item 64 Branch's role:

Check the box "Selling location" if the branch sold the products or instruments recorded in Items 39 or 40 to a customer. Check the box "Paying location" if a customer received payment from the branch for the products or instruments recorded in Items 39 or 40. Check the box "Both" if the Part III financial institution branch was both a paying and selling location for the products or instruments recorded in Items 39 or 40. This item must be blank if no branch is involved in the suspicious activity. If multiple branches are involved in the suspicious activity, a separate Item 64 must be prepared for each branch.

- * 65. Address of branch or office where activity occurred
 - a. If no branch activity involved, check this box.

Items *65 and 67-70 Branch address items: See the instructions for Items *57 - *61 and General Instruction 7 for information on entering address data. If a branch address item is unknown, leave that item blank. Item 70 "Country" cannot be blank if any other branch address information is recorded. If no branch was involved in the suspicious activity, check box 65a and leave the branch address items blank. If multiple branches are involved in the suspicious activity, complete a set of branch address items for each branch.

66. RSSD number *(of the Branch)*

Item 66 RSSD number: Enter the RSSD (Research Statistics Supervision Discount) number of the branch, if known. If multiple branches are involved in the suspicious activity, complete Item 66 for each branch for which the RSSD number is known.

67. City

68. State

69. ZIP/Postal Code

70. Country (* if 65a is NOT selected) *(2 letter code – list provided)*

----- Part IV Filing Institution Contact Information -----

Part IV records information about the lead financial institution, holding company, agency, or other entity that is filing the FinCEN SAR. There must be only one Part IV record in a FinCEN SAR. Do not include information about joint filers in a Part IV record. Joint filer information must be reported in a Part III record. Financial institution as used in Part IV includes individuals acting as sole proprietorship financial institutions using their personal Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN).

- * 78. Primary Federal Regulator (*instructions specify banking agencies, SEC, CFTC, IRS*)
- a. Commodities Futures Trading Commission (CFTC)
 - b. Federal Reserve Board (FRB)
 - c. Federal Deposit Insurance Corporation (FDIC)
 - d. Internal Revenue Service (IRS)
 - e. National Credit Union Administration (NCUA)
 - f. Office of the Comptroller of the Currency (OCC)
 - g. Securities and Exchange Commission (SEC)
 - h. Federal Housing Finance Agency (FHFA)
 - z. Not Applicable.

Item *78 Primary federal regulator: Select the appropriate option from the drop-down list to identify the Primary Federal Regulator or BSA Examiner of the filing institution. If more than one regulator option could apply, select the regulator that has primary responsibility for enforcing compliance with the BSA. If Item 82 option "Casino/Card Club," "Insurance Company," or "MSB" is selected, the Item 78 entry must be "Internal Revenue Service (IRS)." If the financial institution filing the FinCEN SAR is subject to U.S. law and none of the other codes apply, the entry must be "Internal Revenue Service (IRS)." If the FinCEN SAR is being filed by a government agency or if the financial institution filing the FinCEN SAR is not subject to U.S. law, the entry must be "Not Applicable."

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

Item *79 Filer name: Enter the legal name of the filing institution as recorded on articles of incorporation or other documents establishing the institution. Enter the full name of the filer if the filer is an individual, such as a sole proprietorship, acting as a financial institution. If an individual's name is recorded, enter the name in (first name) (middle name) (last name) or equivalent format, e.g. John Jacob Doe or Richard R. Roe II, etc.

- * 80. TIN

Item *80 - TIN: Enter the Taxpayer Identification Number (TIN), either U.S. or foreign, of the financial institution or individual recorded in Item 79. See General Instruction 9 for information on entering identifying numbers.

- * 81. TIN type

- a. EIN
- b. SSN/ITIN
- c. Foreign

Item *81 - TIN type: Record the type of TIN entered in Item 81 by selecting the appropriate option.

- *82. Type of financial institution (check only one)
- a. Casino/Card club
 - b. Depository institution
 - c. Insurance company
 - d. MSB
 - e. Securities/Futures
 - f. Loan or Finance Company
 - g. Housing GSE
 - z. Other (*specify type of institution in space provided*)

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

NOTE: If the financial institution is a non-bank residential mortgage lender or originator, select "Other" and enter "NON-BANK RESIDENTIAL MORTGAGE" in the associated text field. If the financial institution is a dealer in precious metals, stones, or jewels, select option "Other" and enter "DEALER IN PRECIOUS METALS STONES JEWELS" in the associated text field.

83. Type of Securities and Futures institution or individual filing this report—check box(es) for functions that apply to this report
- a. Clearing broker - securities
 - b. CPO/CTA
 - c. Futures Commission Merchant
 - d. Holding company
 - e. Introducing broker - commodities
 - f. Introducing broker - securities
 - g. Investment Adviser
 - h. Investment company
 - i. Retail foreign exchange dealer
 - j. SRO Futures
 - k. SRO Securities
 - l. Subsidiary of financial/bank holding company
 - z. Other (*specify type of institution or individual in space provided*)

Item 83 - Securities and futures type: If option 82e "Securities/Futures" was selected, check all boxes that apply to indicate the type of securities and futures institution that is filing the FinCEN SAR. If none of options 83a through 83l apply, check box 83z "Other" and record a brief description of the type in the associated text field. If necessary, include a more-detailed description in Part V.

84. Filing institution identification number (Check one box to indicate type)
- a. *(check if)* Central Registration Depository (CRD) number
 - b. *(check if)* Investment Adviser Registration Depository (IARD) number
 - c. *(check if)* National Futures Association (NFA) number
 - d. *(check if)* Research Statistics Supervision Discount (RSSD) number
 - e. *(check if)* Securities and Exchange Commission (SEC) number
 - f. *(check if)* National Association of Insurance Commissioners (NAIC Code)
 - g. *(check if)* Mortgage (NMLS ID)
 - h. Identification number

Item 84 - Filing institution identification number: See instructions for Item 51.

* 85. Address

Items 85-89 - Address: See instructions for Items 57 through 61.

* 86. City

87. State

* 88. ZIP/Postal Code

* 89. Country

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

Item 90 - Alternate name: See the instructions for Item 54.

91. Internal control/file number

Item 91 - Internal control/file number: See instructions for Item 62.

92. LE contact agency

Item 92 - LE contact agency: Enter the name of the law enforcement agency, if any, which has been informed of the suspicious activity.

NOTE: If more than one LE agency has been contacted about the suspicious activity, record the information on one agency in Items 92-95 and the information on additional agencies in Part V.

93. LE contact name

Item 93 - LE contact name: Enter the name of the person contacted at the law enforcement agency.

94. LE contact phone number

a. Extension (*if any*)

Item 94 - LE contact phone number: Enter the law enforcement contact telephone number. See General Instruction 8 for information on entering telephone numbers.

Item 94a - Extension: Enter the extension, if any, of the law enforcement contact telephone number.

95. LE contact date

Item 95 - LE contact date: Enter the most-recent date the law enforcement agency was contacted about the suspicious activity. If the agency was contacted on multiple dates, record the earlier contact dates in Part V.

* 96. Filing institution contact office

Item 96 - Filing institution contact office: Enter the name of the filing institution contact office where additional information about the FinCEN SAR or supporting documentation can be requested. If the FinCEN SAR is jointly filed, enter in Part V the contact office and telephone number information for all Part III joint filers.

* 97. Filing institution contact office phone number including area code

a. Extension, if any

Item 97 - Filing institution contact office phone number: Enter the contact office telephone number. See General Instruction 8 for additional instructions on entering telephone numbers.

Item 97a - Extension: Enter the extension, if any, of the contact office telephone number.

* 98. Date filed

Item 98 - Date filed: Enter the date the FinCEN SAR is filed. This date will be entered automatically when a discrete FinCEN SAR is electronically filed.

----- * Part V Suspicious Activity Information – Narrative -----

The narrative section of the report is critical to understanding the nature and circumstances of the suspicious activity. The care with which the narrative is completed may determine whether the described activity and its possible criminal nature are clearly understood by investigators. Filers must provide a clear, complete, and concise description of the activity, including what was unusual or irregular that caused suspicion. This description should encompass the data provided in Parts I through III, but should include any other information necessary to explain the nature and circumstances of the suspicious activity. Filers should provide any information the filers believe necessary to better enable investigators to understand the reported suspicious activity. Narratives must be completed in English. Filers should use the following checklist as a guide for preparing the narrative:

- If filers have additional information pertaining to items in Parts I through IV this information should be recorded in the narrative and referenced to the item number.
- If this report is a corrected or amended report, complete the report in its entirety with whatever corrections or amendments were required. Describe the corrections or amendments at the beginning of the narrative.
- If this report is a continuing report, describe the circumstances surrounding the suspicious activity for the 90-day period encompassing the report. Include information from prior FinCEN SAR narratives only when it is necessary for an understanding of the nature and circumstances of the suspicious activity. Never include the entire narratives of the prior FinCEN SARs.
- If any item in the report was insufficient for recording all item data held by the filer, or if an item's instructions require entry of additional data or explanation in the narrative, record the additional data referenced by item number in the narrative.
- Information provided in other sections of the FinCEN SAR need not be repeated in the narrative unless necessary to provide a clear and complete description of the suspicious activity.
- Describe the conduct or transaction(s) that caused suspicion. If appropriate, this description should be chronological when the activity involves multiple instances or encompasses more than one day.
- Explain whether any transaction(s) involved were completed or only attempted.
- Explain who benefited and how they benefited, financially or otherwise, from the activity.
- Describe all supporting documentation and retain the documentation for five years. DO NOT include supporting documentation with the FinCEN SAR. (See General Instruction 6.)
- If the FinCEN SAR is jointly-filed, name all joint filers and describe the nature of supporting document held by the joint filers. Provide the contact office name and telephone number for each joint filer.
- Describe and retain any evidence of cover-up or evidence of an attempt to deceive federal or state examiners or others.

- Describe and retain any admission or explanation of the activity or transaction(s) provided by the subject(s), witness(s), or other person(s), including to whom and when it was given.
- Indicate where the suspicious activity took place, e.g. branch, cage, gaming pit, agent location, etc.
- Indicate whether the suspicious activity is an isolated incident or related to other activity.
- Indicate whether any U.S. or foreign currency or other negotiable instruments were involved. If foreign currency or other foreign instruments, provide the foreign amount, currency name, and country of origin.
- Indicate if there is any litigation related to the activity by specifying the name of the litigation and court where the action is pending.
- Describe the nature of losses and recoveries related to the suspicious activity, including aggregated losses and recoveries in continuing activity.
- Identify the names of financial institutions associated with account numbers when the financial institution TINs were unknown.
- If the subject is a foreign national provide all available information on the subject's passport(s), visa(s), and other identification. Include identifying data such as issuing date, country, document numbers, issuing authority, and nationality.
- If the suspicious activity involves transfers of funds to or from a foreign country or currency exchanges involving foreign currencies, identify the foreign currency, country of issue, and the source or destination of the funds.
- If a subject involved in the suspicious activity has an insider relationship with a financial institution, describe the subject's position with the financial institution and how that position related to the suspicious activity.
- Indicate if any information was excluded from this report and explain the nature of the excluded information and the reason(s) for exclusion.
- Provide information on the victims of the suspicious activity only when it is necessary for a complete understanding of the activity. DO NOT record victim information in a Part I Subject Information record.
- Provide information about the financial institution's business policies and practices only if it is necessary for a complete understanding of the suspicious activity. DO NOT include legal disclaimers in the narrative.

Add Attachment:

Filers can include with a FinCEN SAR an attachment containing tabular data (such as transaction data) that provides additional suspicious activity information not suitable for inclusion in the narrative. This file must be an MS Excel-compatible comma separated value (CSV) file with a maximum size of 1 megabyte. Discrete FinCEN SAR filers can attach this file by clicking the "Add Attachment" button on the discrete FinCEN SAR header page and following the instructions provided. Batch filers must follow the instructions in Attachment D – Batch Attachments to add CSV files to a batch file.

Attachment D – Batch Attachments

Institutions filing electronic FinCEN Suspicious Activity Reports (FinCEN SAR) may, but are not required to, attach a Microsoft Excel-compatible comma separated values (CSV) file (no larger than 1 MB) providing details in tabular form of transactions subject to the suspicious activity discussed in Part V “Narrative Description” of the FinCEN SAR.

NOTE: Please be advised that when entering data into an Excel spreadsheet prior to saving it as a comma separated (.CSV) file, the default behavior for numeric data entered into cells is to convert numeric values over 11 characters into scientific notation. For example, the value of 123456789123 is converted to 1.23457E+11 after entry. When the Excel spreadsheet is saved to a comma separated (.CSV) file, this visible format is retained and when opened the entire original number is not displayed, 123456789123, but rather 1.23457E+11. To avoid this behavior, please ensure that your workbook cells are formatted as text prior to entering data in the cell. This can be accomplished by selecting the column, right clicking the mouse and selecting Format Cells, and then selecting Text under Category, and then OK. This must be done before entering the data, not after.

While the BSA E-Filing System limits the number of attachments for a single FinCEN SAR to one (1) CSV file, batch filers must abide by the following instructions in order to submit attachments for one or more FinCEN SAR within their batch file:

1. Identify which FinCEN SARs in the batch are associated with attachments

Ensure *attachment indicator*—located in field position 8 of the Suspicious Activity Information (3A) Record of the FinCEN SAR batch file—contains an “X,” which indicates that the corresponding FinCEN SAR contains an attachment. The count (i.e. sum) of all FinCEN SARs within the batch file that are associated with an attachment should appear in the File Summary (9Z) Record (field position 45-51).

2. Reference the FinCEN SAR Transaction Sequence Number in your attachment file name

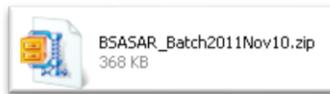
When naming your attachment file for a particular FinCEN SAR, you must first locate the unique transaction sequence number that has been assigned to the corresponding FinCEN SAR within the batch file (see field position 3-7 of the Suspicious Activity Information (3A) Record); you must reference the transaction sequence number at the beginning of your attachment file name, followed by an underscore (i.e. “_”) and a descriptive name to help identify the associated FinCEN SAR.

00001_JohnSmithBSASAR2011Nov5.csv

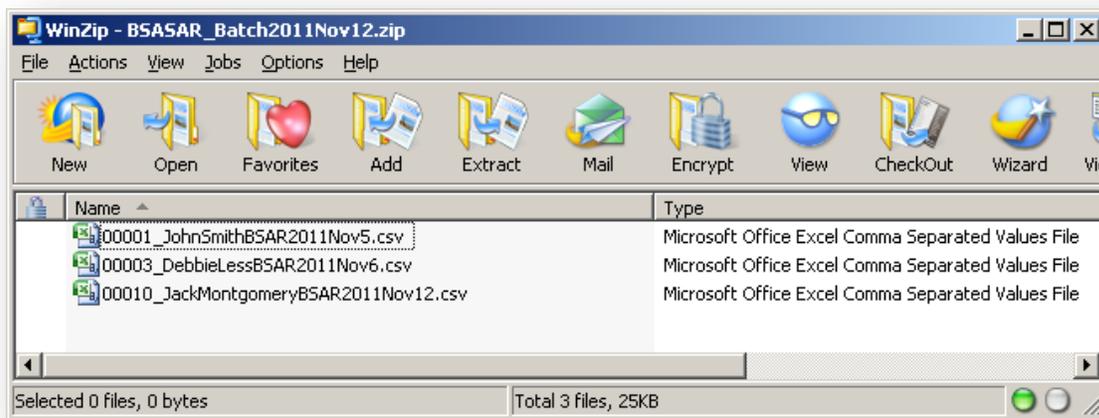
Attachment File Name Example

3. Include all attachments (associated with the FinCEN SAR batch file) in a single zip file

Subsequent to the file renaming for all attachments associated with your batch file, you must create a zip file composed of all attachments. When naming the zip file, be sure to use a descriptive file name to help you identify which FinCEN SAR batch your attachment zip file is associated with.



ZIP File Name Example



ZIP File Layout Example

4. Add the attachment zip file to the FinCEN SAR Batch Form prior to submission

Once all required fields are complete and your FinCEN SAR batch has been attached to the FinCEN SAR Batch Form, locate the *Add File* button for attachments in order to add your attachment zip file to the FinCEN SAR Batch Form. Once the attachment file is attached, you may sign the FinCEN SAR Batch Form with your PIN, save, and submit.

Secure Data Transfer Mode Users

For filers using this option for filing, SDTM users can submit a single ZIP file containing the FinCEN SAR batch data and the corresponding attachment data. The ZIP file is composed of one FinCEN SAR batch data file and one attachment ZIP file. The attachment Zip file should follow the BSAR attachment specification described above. The ZIP file name must start with "BSARST." and end with ".ZIP". An example will be: BSARST.BSAR_batch.ZIP. FinCEN SAR SDTM batch files without any attachment can follow the existing naming convention: BSARST.<optional_file_name_and_extension>. Only ZIP compressed files are supported for the attachment file.

Attachment E- Batch File Sample Layouts

Submitting batch files in the correct format is vitally important because improperly formatted files may be rejected and can result in data entering FinCEN's System of Record database incorrectly. Batch filers will use the Financial Institution Where Activity Occurred (2B) Record and the Branch or Office Institution Where Activity Occurred (2C) Record for reporting information about the location(s) of suspicious activity(s). The 2B record identifies information regarding the financial institution where activity(s) occurred (required), whereas the 2C record identifies the financial institution's branch or office location where activity occurred (if applicable). Filers are permitted to associate up to 99 2B records, as well as 99 2C records for each 2B record, for a single suspicious activity report. However, filers are NOT permitted to associate multiple Suspicious Activity Information (3A) Records under one or more shared 2B/2C records.

General Rules:

Following are general rules for creating batch files with the required record layout.

1. Records must be in alphanumeric order for each SAR in the batch and grouped together according to their transaction sequence number. For example, a primary Subject (4A) Record cannot precede a primary Suspicious Activity Information (3A) Record if they both coincide with the same SAR in the batch. A subordinate Subject Identification (4C) Record cannot precede a subordinate Subject Address (4B) if they both coincide with the same primary Subject (4A) Record. The transaction sequence number associated with the first SAR in the batch will be "00001" and all subsequent records up to the Narrative (5A) Record associated with the first SAR will share the same transaction sequence number.
2. Subordinate records must follow the specific primary record they are associated with. A 4B record must follow the 4A record of the subject that has that address. A Branch or Office Institution Where Activity Occurred (2C) Record must follow the Financial Institution Where Activity Occurred (2B) Record of the financial institution that owns that branch. Do not, for example, place all 4B records following the last of multiple 4A records or all 2C records following the last of multiple 2B records unless they are only associated with the last of multiple records.
3. Individual subordinate records cannot be associated with multiple primary records. If two primary 4A record subjects have the same address, each 4A record

must be followed by a separate subordinate 4B record containing that address. A 4B record following a second 4A record is not associated with the first 4A record. A 4B record following the first of two 4A records is not associated with the second 4A record.

4. There can be up to 99 of each of the subordinate 3B through 3F records associated with each primary 3A record in a batch file.
5. There can be up to 99 of each of the subordinate 4B through 4I records associated with each primary 4A record in a batch file.
6. There can be up to 20 Narrative Description (5A) Records associated with each SAR in a batch file.
7. Do not include blank subordinate records in a SAR. If a subject does not have an alternate name, there will be no Subject Alternative Name (4D) Record following that subject's 4A record in the SAR.
8. Do not include duplicate records in a SAR. A duplicate record occurs when one record is directly followed by a second record of the same record type that contains exactly the same data as the prior record.

Sample Layout:

Table 1 contains an example valid batch file record layout where multiple financial institutions, branch/office locations, multiple subjects, and subsidiary records are included designed to show the required positions and inclusion or exclusion of batch file records in varying circumstances.

Table 1 - Batch File Sample Layout

This batch file was transmitted by the 1A record transmitter for 2A record Filing Institutions A and B. Three SARs are filed under the 2A record for Filing Institution A and one SAR is filed under the 2A record for Filing Institution B.

SAR1, Financial Institution A-1 and Branch A-1.1: A single subject is involved with suspicious activity at a single financial institution and one branch location. This example contains all subsidiary 3B-3F and 4B-4I records to show their placement.

SAR2, Financial Institution A-1 and Branch A-1.1: A single subject is involved with suspicious activity at a single financial institution and one branch location. This example has a 3B commodity type record and a 3C product/instrument description type record subordinate to the 3A record. The 4A record only has single 4B address, 4C identification, and 4H relationship records followed by two 4I account records for two account numbers. This SAR has multiple 5A narrative sections.

SAR3, Financial Institution A-1 and Branches A-1.1 and A-1.2, Financial Institution A-2 and Branch A-2.1: two subjects involved in suspicious activity at two different financial institution, one with two branches and one with one branch. There are no subsidiary records following the 3A record. Subject 1's 4A record has single 4B address and 4C identification records and two 4H relationship records, one for each 2B financial institution. Subject 2 has only one of various subsidiary records including one 4H relationship record because Subject 2 has a relationship with only one of the institutions.

SAR4, Financial Institution B-1 with no branch activity and Financial Institution B-2 with Branches B-2.1 and B-2.2: A single subject is involved in suspicious activity at two institutions, one with two branch locations. All information about the subject and the subject's possible relationship to the financial institutions is unknown.

Subordinate records have been indented for clarity.

Batch Layout

1A (Transmitter)

2A (Filing Institution A)

 2B (Financial Institution A-1) (note: SAR1 begins)

 2C (Branch A-1.1)

3A (Suspicious Activity Information)

 3B (Commodity Type)

 3C (Product/Instrument Description)

 3D (Market)

 3E (IP Address)

 3F (CUSIP)

4A (Subject 1)

 4B (S-1 Address)

 4C (S-1 Identification)

 4D (S-1 Alternate name)

 4E (S-1 Telephone)

- 4F (S-1 E-mail)
- 4G (S-1 Website URL)
- 4H (S-1 Relationship)
- 4I (S-1 Account)
- 5A (Narrative) (note: can have multiples)
- 9A (Summary of SAR1)
 - 2B (FI A-1) (note: SAR2 begins)
 - 2C (Branch A-1.1)
- 3A (Suspicious Activity Information)
 - 3B (Commodity Type)
 - 3C (Product/Instrument Description)
- 4A (Subject 1)
 - 4B (S-1 Address)
 - 4C (S-1 Identification)
 - 4H (S-1 Relationship)
 - 4I (S-1.1 Account)
 - 4I (S-1.2 Account)
- 5A (Narrative)
- 5A (Narrative)
- 5A (Narrative)
- 9A (Summary of SAR2)
 - 2B (FI A-1) (note: SAR3 begins)
 - 2C (Branch A-1.1)
 - 2C (Branch A-1.2)
 - 2B (FI A-2)
 - 2C (Branch A-2.1)
- 3A (Suspicious Activity Information)
- 4A (Subject 1)
 - 4B (S-1 Address)
 - 4C (S-1 Identification)
 - 4H (S-1 Relationship)
 - 4H (S-1 Relationship)
- 4A (Subject 2)
 - 4B (S-1 Address)
 - 4C (S-1 Identification)
 - 4D (S-1 Alternate name)
 - 4E (S-1 Telephone)
 - 4F (S-1 E-mail)
 - 4H (S-1 Relationship)

4I (S-1 Account)
5A (Narrative)
9A (Summary of SAR3)
9B (Summary of Filer A)
2A (Filer B)
 2B (FI B-1) (note: SAR4 begins)
 2B (FI B-2)
 2C (Branch B-2.1)
 2C (Branch B-2.2)
3A (Suspicious Activity Information)
4A (Subject 1)
5A (Narrative)
9A (Summary of SAR4)
9B (Summary of Filer B)
9Z (Summary of Batch File)