

Bank Secrecy Act (BSA) Webinar 2012

Fran Sponsler, CRCM, CAMS, CCBCO

Fred Lutz, CRCM

Val Vought, CCBCO

FORTNER, BAYENS, LEVKULICH
■
& GARRISON, P.C.

What is the BSA?

- The Bank Secrecy Act (BSA) requires all financial institutions, casinos, and certain other businesses to:
 - Monitor customer behavior
 - File reports on transactions that meet certain dollar amounts
 - Maintain records of certain transactions
 - The Currency Transaction Report (CTR), which records cash transactions that exceed \$10,000.
 - The Suspicious Activity Report (SAR), which records any known or suspected federal violation of federal law.
- The BSA aids law enforcement by uncovering criminal activities such as money laundering, drug trafficking, tax fraud, and possible terrorist financing.



An Effective BSA Program

The Four Pillars:

- System of Internal Controls
- Annual Independent Testing
- Designate your BSA Officer Annually (include continuity/succession plan)
- Annual Training (INCLUDING BOARD OF DIRECTORS!)

Your BSA/AML/OFAC program should be designed to protect your bank from Money Laundering and Terrorist Financing.



Additional Elements or Components

- **OFAC is part of the US Treasury Department and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries, terrorists, and international narcotics traffickers**
- **Parties subject to the OFAC sanctions are:**
 - Specially Designated Nationals
 - Specially Designated Terrorists
 - Specially Designated Narcotics Traffickers
 - Blocked Persons
 - Blocked Vessels
- **OFAC laws require banks to identify any transactions and property subject to the economic sanctions**
- **Once identified, the asset must be blocked or the transaction may be rejected**

Customer Identification Program (CIP)

- Three basic rules

- **Verify identity** of person opening account
- **Maintain records** for 5 years after account is closed
- **Check government lists** (OFAC)



- To verify identity, you must obtain **five** important pieces of information prior to opening an account:
 - **Name**
 - **Date of birth**
 - **Residential or business street address**
 - **Numbers (US Tax ID # or foreign issued alien ID card #)**
 - **Document (Place of Issuance, Number, Issue & Expiration Date)**
- The Bank must have a Notice displayed on each new account and loan officer desk explaining the customer identification program.

Formal Risk Assessment

A formal risk assessment should address:

- Products and Services (do not forget ACH, Third Party Providers and RDC)
- Geographic Locations
- Customer Base
- OFAC
- Update Annually

The New E-File Requirements

Why is FinCEN mandating E-Filing?

- In an effort to improve efficiency, reduce government and industry costs, and enhance the ability of FinCEN, law enforcement, and regulators to gain better and timelier access to important financial information, the Financial Crimes Enforcement Network (FinCEN) is requiring the electronic filing of certain FinCEN reports.

Additionally, BSA E-Filing allows organizations or individuals to electronically and securely file discrete and batched FinCEN reports. It also allows a registered user to send secure messages to FinCEN (and receive responses where appropriate).

When did FinCEN decide to make E-Filing mandatory?

- On September 16, 2011, FinCEN issued a notice and request for comments on the proposed requirement for electronic filing. On December 20, 2011, FinCEN issued an update extending the deadline for adopting the new CTR and SAR reports to March 31, 2013, but also indicated that FinCEN intends to mandate electronic filing of reports after June 30, 2012. A Final Notice mandating E-Filing was issued by FinCEN on February 24, 2012 (Final Notice 77 Fed. Reg. 12367 (2012)). For more information please visit http://www.fincen.gov/news_room/nr/pdf/20120223.pdf, E-Filing is mandatory as of July 1, 2012 unless you were granted a temporary exemption.

What steps must be taken to register for E-Filing?

- Visit the [BSA E-Filing System](#). Click [Become a BSA E-Filer](#) and follow the instructions in order to enroll yourself as an individual FBAR filer or your organization as a Supervisory User in BSA E-Filing. The enrollment process can take from five to seven days. If your organization has already enrolled in BSA E-Filing, contact your organization's Supervisory User to obtain instructions for enrolling yourself as a general user.

Is there a cost to participating in BSA E-Filing?

- No, the BSA E-Filing system is free.

When does E-Filing become mandatory?

- With limited exceptions, E-Filing is mandatory effective July 1, 2012.

When are the new FinCEN reports required to be filed?

- FinCEN will continue to accept the most current "legacy" reports submitted via E-Filing until the mandated use of the new reports on March 31, 2013.

What happens if a paper report is submitted after the July 1, 2012, electronic deadline?

- FinCEN may impose civil money penalties for noncompliance with our regulations, including \$500 for each negligent currency transaction or suspicious activity reporting violation under 31 C.F.R. § 1010.820.

Where can I find more information about BSA E-Filing?

- For more information about BSA E-Filing, please review the [E-Filing Section](#) on FinCEN's Web site. FinCEN is committed to working with financial institutions to increase their understanding of the value of E-Filing and has issued a [brochure](#) that highlights its benefits. For other technology-related questions specific to E-Filing, please call the BSA E-Filing Help desk at 1-866-346-9478. FinCEN has additionally prepared an [instructional presentation](#) on how to file electronically.

What FinCEN Reports must be E-Filed?

- Most all FinCEN reports fall within the E-Filing mandate. For practical reasons, the Currency and Monetary Instrument Report (CMIR), which is most often completed by individuals upon physically crossing the border into the United States, is not included in the mandate. FinCEN Form 8300, Report of Cash Payments Over \$10,000 Received in a Trade or Business, may also continue to be filed on paper.

To receive the various benefits received from E-Filing, FinCEN encourages individuals to E-File FBARs (Reports of Foreign Bank and Financial Accounts) electronically and has made that option available at the [BSA E-Filing website](#). However, FinCEN granted a general exemption for mandatory E-Filing for the FBAR until June 30, 2013.

Source: FinCEN Website - June ,2012

CTR Requirements


- Before conducting any transaction in which a CTR is required, the Bank must collect the following information for the individual, business, or entity that will benefit from the transaction (the beneficiary), and the individual conducting the transaction (the conductor):
 - For online instructions .<http://bsaefiling.fincen.treas.gov/news/FinCENCTRElectronicFilingRequirements.pdf>

Beneficiary	Conductor
<ul style="list-style-type: none">■ Name (including Doing Business As (DBA))■ Address■ SSN or EIN■ Date of Birth (for individuals)■ Occupation, Profession, or Nature of Business■ Proper Identification■ Email Address (if possible)	<ul style="list-style-type: none">■ Name■ Address■ SSN■ Date of Birth■ Proper Identification

The New CTR

Currency Transaction Report

Home Step 1. Person Information Step 2. Amount and Type of Transaction Step 3. Financial Institution Information

 **Currency Transaction Report** Version Number: 1.0

Filing Name

*1 Type of filing Initial report Correct/amend prior report FinCEN directed Backfilling

Document Control Number / BSA Identifier

Under penalties of perjury, I declare that I have examined this transmittal, including accompanying documents, and to the best of my knowledge and belief it is correct and complete. In the case of documents without recipient's identifying numbers, I have complied with the requirements of the law in attempting to secure such numbers from the receipts. I declare that this filing represents all Documents filed during this reporting period except for those transactions reported on paper.

Currency Transaction Report

Home

Step 1. Person Information

Step 2. Amount and Type of Transaction

Step 3. Financial Institution Information

Part I Person Involved in Transaction 1 of 1

+ -

*2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)
 3 Multiple transactions

Check If entity

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

*5 First name Unknown

6 Middle name

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business

9a NAICS Code

*10 Address Unknown

*11 City Unknown

*12 State Unknown *13 ZIP/Postal Code Unknown

*14 Country Unknown

*15 TIN Unknown 16 TIN type

*17 Date of birth Unknown

18 Contact phone number Ext.

19 E-mail address

*20 Form of Identification used to verify Identity Unknown

Driver's license/State ID Passport Alien Registration Other

Number Country Issuing State

21 Cash in amount for individual or entity listed in Item 4 \$

Account number + -

22 Cash out amount for individual or entity listed in Item 4 \$

Account number + -

Currency Transaction Report

Home

Step 1. Person Information

Step 2. Amount and Type of Transaction

Step 3. Financial Institution Information

Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23 Date of transaction

24 Armored car (FI Contract) ATM Mail Deposit or Shipment Night Deposit Aggregated transactions

*25 CASH IN: (In U.S. dollar equivalent)

a	Deposit(s)	\$	<input type="text"/>	.00
b	Payment(s)		<input type="text"/>	.00
c	Currency received for funds transfer(s) out		<input type="text"/>	.00
d	Purchase of negotiable instrument(s)		<input type="text"/>	.00
e	Currency exchange(s)		<input type="text"/>	.00
f	Currency to prepaid access		<input type="text"/>	.00
g	Purchases of casino chips, tokens and other gaming instruments		<input type="text"/>	.00
h	Currency wager(s) including money plays		<input type="text"/>	.00
i	Bills inserted into gaming devices		<input type="text"/>	.00
z	Other (specify):		<input type="text"/>	.00

Total Cash In \$.00

*27 CASH OUT: (In U.S. dollar equivalent)

a	Withdrawal(s)	\$	<input type="text"/>	.00
b	Advance(s) on credit (including markers)		<input type="text"/>	.00
c	Currency paid from funds transfer(s) in		<input type="text"/>	.00
d	Negotiable instrument(s) cashed		<input type="text"/>	.00
e	Currency exchange(s)		<input type="text"/>	.00
f	Currency from prepaid access		<input type="text"/>	.00
g	Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments		<input type="text"/>	.00
h	Payment(s) on wager(s) (including race and OTB or sports pool)		<input type="text"/>	.00
i	Travel and complimentary expenses and book gaming incentives		<input type="text"/>	.00
j	Payment for tournament, contest or other promotions		<input type="text"/>	.00
z	Other (specify):		<input type="text"/>	.00

Total Cash out \$.00

26 Foreign Cash In

Foreign Country

+ -

28 Foreign Cash out

Foreign Country

+ -

Currency Transaction Report

Home

Step 1. Person Information

Step 2. Amount and Type of Transaction

Step 3. Financial Institution Information

Part III Financial Institution Where Transaction(s) Takes Place 1 of 1

*37 Type of financial institution

Other (specify)

*29 Primary federal regulator

38 If 37a - Casino/Card Club is checked, indicate type (check only one)

State licensed casino

Tribal authorized casino

Card club

Other

*30 Legal name of financial institution

31 Alternate name, e.g. trade name, DBA

*32 EIN

*33 Address

*34 City

*35 State

*36 ZIP Code

39 Financial institution ID type

ID number

*40 Contact office

*41 Phone number Ext.

*42 Date Filed (Date filed will be auto-populated when the form is signed.)

SAR Guidance

Tips on SAR Form Preparation & Filing

SARs are *properly filed with the Internal Revenue Service's Detroit Computing*

Center. Questions on how to complete the SARs should be directed to the appropriate regulator or to FinCEN's Regulatory Help Line at 800-949-2732 or online at

<http://bsaefiling.fincen.treas.gov/news/FinCENSARElectronicFilingRequirements.pdf>

SAR Guidance Continued

Banks must file a Suspicious Activity Report (SAR) in accordance with the regulations and the SAR form instructions when they detect a “known or suspected violation” of federal law or a suspicious financial transaction.

File SAR whenever....

- The bank detects a known or suspected violation of federal criminal law and has a substantial basis to believe that one of its directors, officers, employees, agents, or other bank-affiliated parties committed or aided in the commission of the violation (regardless of the amount)

OR

- Involving or aggregating \$5,000 or more (before reimbursement or recovery), and the bank has a substantial basis for identifying a possible suspect or group of suspects
- The bank detects any financial transaction conducted or attempted, by, at, or through the bank involving or aggregating \$5,000 or more, if the bank knows, suspects, or has reason to suspect that the transaction involves funds derived from illegal activity or is for the purpose of hiding or disguising funds from illegal activities

Continued

OR

- Is designed to evade any requirements under the Bank Secrecy Act

OR

- Has no business or apparent lawful purpose or is not the sort of transaction in which the particular customer would normally be expected to engage, and the bank knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction.
- If a currency transaction exceeds \$10,000 and is suspicious, the bank will file both a CTR (reporting the currency transaction) and a SAR (reporting the suspicious criminal aspect of the transaction). If a currency transaction equals or is below \$10,000 but is suspicious, the bank will file only a SAR.
- A bank must file the SAR no later than 30 calendar days after the date of initial detection of facts that may constitute a basis for filing a SAR. If not suspect was identified on the date of detection of the incident triggering the filing, the bank may delay filing the SAR for an additional 30 calendar days to identify a suspect. In no case is reporting to be delayed more than 60 calendar days after the date of initial detection of a reportable transaction.

Continued

- In situations involving violations requiring immediate attention, the bank is to immediately notify the appropriate law enforcement agency and bank regulatory agency in addition to filing the SAR.
- Banks are encouraged to provide a copy of the SAR to state and local law enforcement agencies when appropriate.
- Banks need not file the SAR for a robbery or burglary committed or attempted, that is reported to appropriate law enforcement authorities.

Continued

- Time for Reporting
- Retention of Records
- Notification to the Board of Directors
- Confidentiality
- One Time Filing versus Continuous

The Narrative of the SAR

#1 Rule:

Do not assume the reader is familiar with your institution's internal terminology, acronyms, operational processes, or has other knowledge related to the reported violation.

The Narrative should:

- Be **concise and clear**
- Provide a **detailed** description of the known or suspected criminal violation or suspicious activity
- **Identify** the essential elements of information (the 5 W's)
- Be **chronological and complete**.

The 5 W's of Information:

- ✓ Who?
- ✓ What?
- ✓ When?
- ✓ Where?
- ✓ Why?

“How?” can be important, too!

Preparing a SAR Narrative

- ❖ **Who** is conducting the criminal or suspicious activity? Describe additional details about the suspect(s) other than those provided earlier in the SAR form:
 - Employer and occupation information
 - Relationship between the suspect and the filing institution
 - Length of the financial relationship
- ❖ **What** instruments or mechanisms facilitate the suspect activity/transactions? Identify and describe the transactions raising the suspicions of the financial institution. Examples include:
 - Cash deposits and/or withdrawals
 - Checks and other monetary instruments (money orders; traveler's checks; cashiers or bank checks)
- ❖ **Where** did the suspicious activity take place? Identify the branch/department location or locations within the institution where the activity occurred. Identify all account numbers & types of account affected by the transactions/activity. Indicate if suspect transactions involve other domestic or international banks and identify the banks, their locations, account numbers, etc.
- ❖ **When** did the criminal or suspicious activity occur? If a one-time occurrence, identify the date. If a pattern of activity occurred over a span of time, state when the activity first initiated and then describe the activity during the duration. Identify when the activity was detected.
- ❖ **Why** does the institution think the activity is suspicious?

❖ **How** did the suspicious activity occur?

- In a concise, accurate and logical manner, describe how the suspect transaction or pattern of transactions were completed.

- For account activity, provide as completely as possible an explanation of the cycle of funds including the source of the funds in the account and application of those funds.

❖ **Suggested structure of the narrative:**

- Introduction

- Body

- Conclusion

❖ **The Introduction**

- Provide a brief statement of the SAR's purpose

- Generally describe the known or suspected violation

- Identify the date of any SARs previously filed on the subject and the purpose of that SAR

- Indicate any internal investigative numbers used by the filing institution to maintain records of the SAR

❖ **The Body**

❖ **Provide** the relevant facts about all parties facilitating the suspect activity or transactions.

Answers **Who?**

❖ **Identify** all involved accounts and transactions in chronological order by date and amount – do not use or insert tabular objects, tables, or pre-formatted spread sheets in the narrative. You may now attach a spreadsheet in a tabular format (excel) but only one page attachment.

Answers **What? Where? When?**

- ❖ **Explain** in detail the filer's position that the activity or transaction is illegal or suspicious.

Answers ***Why?***

- ❖ **Describe** the method of operation of the subject:

- Manner in which the activity and/or transactions were completed;
- Any relationship to other transactions, accounts, conductors, etc.; and
- Subsequent results of the activity

Answers ***How?***

- ❖ **The Conclusion** describes where the financial institution will go from here. The action plan, i.e. continued monitoring of the account, etc.

Applicability of Safe Harbor

The safe harbor provisions applicable to SAR filings provide a safe harbor for organizations that provide a SAR to all authorized government personnel, including Federal, state, and local authorities. Similarly, the safe harbor provisions apply even if the report of activity that is a possible violation of law or regulation is made orally or in some form other than through the use of a SAR.

Source: The SAR Activity Review, Issue 2 – June, 2001



The New SAR

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Filing Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative



Suspicious Activity Report

Version Number: 1.0

Filing name

*1 Type of filing
(Check all that apply)

Initial report

Correct/Amend prior report

Continuing activity report

Joint report

Prior report Document Control
Number/BSA Identifier

Attachment

Add Attachment

Delete Attachment

View/Save Attachment

Save

Validate

Submit

Print

Under penalties of perjury, I declare that I have examined this transmittal, including accompanying documents, and to the best of my knowledge and belief it is correct and complete. In the case of documents without recipient's identifying numbers, I have complied with the requirements of the law in attempting to secure such numbers from the receipts. I declare that this filing represents all Documents filed during this reporting period except for those transactions reported on paper.

Sign with PIN

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Filing Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

Part IV Filing Institution Contact Information

*82 Type of financial institution

*78 Primary federal regulator

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

*80 TIN *81 TIN type

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

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

84 Financial institution identification Type Number

*85 Address

*86 City

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

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

91 Internal control/file number

92 LE contact agency

93 LE contact name

94 LE contact phone number (Include Area Code) Ext.

95 LE contact date

*96 Filing institution contact office

97 Filing institution contact phone number (Include Area Code) Ext.

98 Date filed (Date filed will be auto-populated when the form is signed.)

Suspicious Activity Report

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

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

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

Yes

*47 Type of financial institution

*48 Primary federal regulator

49 Type of gaming institution

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

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

Clearing broker-securities Futures Commission Merchant Holding company Introducing broker-commodities

Introducing broker-securities Investment Adviser Investment company Retail foreign exchange dealer

Subsidiary of financial/bank holding company Other

51 Financial institution identification

Type

Number

52 Financial institution's role in transaction Selling location Paying location Both

*53 Legal name of financial institution Unknown

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

*55 TIN Unknown 56 TIN type

*57 Address Unknown

*58 City Unknown

59 State

*60 ZIP/Postal Code Unknown

*61 Country Unknown

62 Internal control/file number

63 Loss to financial institution \$.00

Branch where activity occurred information

If no branch activity involved, check this box

Branch Information + -

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

65 Address of branch or office where activity occurred

67 City 66 RSSD Number

68 State 69 ZIP/Postal Code *70 Country

Suspicious Activity Report

Home

Step 1. Filing Institution Contact Information

Step 2. Filing Institution Where Activity Occurred

Step 3. Subject Information

Step 4. Suspicious Activity Information

Step 5. Narrative

Part I Subject Information 1 of 1

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

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

*4 First name Unknown

5 Middle name/Initial

Suffix Gender

*16 Date of birth Unknown

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

7 Occupation or type of business

7a NAICS Code

*13 TIN Unknown 14 TIN type

18 Phone number Ext. 17 Type

19 E-mail address

19a Website (URL) address

20 Corroborative statement to filer? 25 Subject's role in suspicious activity

Subject Address Information

*8 Address Unknown

*9 City Unknown

*10 State Unknown *11 ZIP/Postal Code Unknown

*12 Country Unknown

*15 Form of identification for subject

Unknown

Type

Number Issuing State Country

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

a Institution TIN

b Accountant e Attorney h Director k Officer

c Agent f Borrower i Employee l Owner or Controlling Shareholder

d Appraiser g Customer j No relationship to institution z Other

22 Status of relationship 23 Action date

*24 Financial institution TIN and account number(s) affected that are related to subject No known accounts involved

Institution TIN Non-US Financial Institution

account number Closed? Yes

Suspicious Activity Report

Home

Step 1. Filing Institution Contact Information

Step 2. Filing Institution Where Activity Occurred

Step 3. Subject Information

Step 4. Suspicious Activity Information

Step 5. Narrative

Part II Suspicious Activity Information

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

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

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

When completing item 29 through 38, check all that apply

29 Structuring

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

30 Terrorist Financing

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

31 Fraud (Type)

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

32 Casinos

- | | |
|--|--|
| a <input type="checkbox"/> Inquiry about end of business day | d <input type="checkbox"/> Suspicious use of counter checks or markers |
| b <input type="checkbox"/> Minimal gaming with large transactions | z <input type="checkbox"/> Other <input type="text" value=""/> |
| c <input type="checkbox"/> Suspicious intra-casino funds transfers | |

33 Money Laundering

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

34 Identification/Documentation

- | | |
|---|---|
| a <input type="checkbox"/> Changes spelling or arrangement of name | d <input type="checkbox"/> Refused or avoided request for documentation |
| b <input type="checkbox"/> Multiple individuals with same or similar identities | e <input type="checkbox"/> Single individual with multiple identities |
| c <input type="checkbox"/> Provided questionable or false documentation | z <input type="checkbox"/> Other <input type="text" value=""/> |

35 Other Suspicious Activities

- | | |
|--|---|
| a <input type="checkbox"/> Account takeover | k <input type="checkbox"/> Suspected public/private corruption (domestic) |
| b <input type="checkbox"/> Bribery or gratuity | l <input type="checkbox"/> Suspected public/private corruption (foreign) |
| c <input type="checkbox"/> Counterfeit instruments | m <input type="checkbox"/> Suspicious use of informal value transfer system |
| d <input type="checkbox"/> Elder financial exploitation | n <input type="checkbox"/> Suspicious use of multiple transaction locations |
| e <input type="checkbox"/> Embezzlement/theft/disappearance of funds | o <input type="checkbox"/> Transaction with no apparent economic, business, or lawful purpose |
| f <input type="checkbox"/> Forgeries | p <input type="checkbox"/> Two or more individuals working together |
| g <input type="checkbox"/> Identity theft | q <input type="checkbox"/> Unauthorized electronic intrusion |
| h <input type="checkbox"/> Little or no concern for product performance penalties, fees, or tax consequences | r <input type="checkbox"/> Unlicensed or unregistered MSB |
| i <input type="checkbox"/> Misuse of "free look"/cooling-off/right of rescission | z <input type="checkbox"/> Other <input type="text" value=""/> |
| j <input type="checkbox"/> Misuse of position or self-dealing | |

Suspicious Activity Report

Home

Step 1. Filing Institution Contact Information

Step 2. Filing Institution Where Activity Occurred

Step 3. Subject Information

Step 4. Suspicious Activity Information

Step 5. Narrative

36 Insurance

[Enable this block](#)

- | | |
|--|---|
| a <input type="checkbox"/> Excessive Insurance | e <input type="checkbox"/> Suspicious termination of policy or contract |
| b <input type="checkbox"/> Excessive or unusual cash borrowing against policy/annuity | f <input type="checkbox"/> Unclear or no insurable interest |
| c <input type="checkbox"/> Proceeds sent to or received from unrelated third party | z <input type="checkbox"/> Other <input type="text"/> |
| d <input type="checkbox"/> Suspicious life settlement sales Insurance (e.g., STOLI's, Viaticals) | |

37 Securities/Futures/Options

[Enable this block](#)

- | | |
|---|---|
| a <input type="checkbox"/> Insider trading | d <input type="checkbox"/> Unauthorized pooling |
| b <input type="checkbox"/> Market manipulation/wash trading | z <input type="checkbox"/> Other <input type="text"/> |
| c <input type="checkbox"/> Misappropriation | |

38 Mortgage Fraud

- | | |
|--|---|
| a <input type="checkbox"/> Appraisal fraud | d <input type="checkbox"/> Reverse mortgage fraud |
| b <input type="checkbox"/> Foreclosure fraud | z <input type="checkbox"/> Other <input type="text"/> |
| c <input type="checkbox"/> Loan Modification fraud | |

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

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

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

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

41 Commodity type (if applicable)

[+](#) [-](#)

42 Product/instrument description (if needed)

[+](#) [-](#)

43 Market where traded [i](#)

[+](#) [-](#)

44 IP address (if available)

[+](#) [-](#)

45 CUSIP® number

[+](#) [-](#)

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Filing Institution
Where Activity Occurred

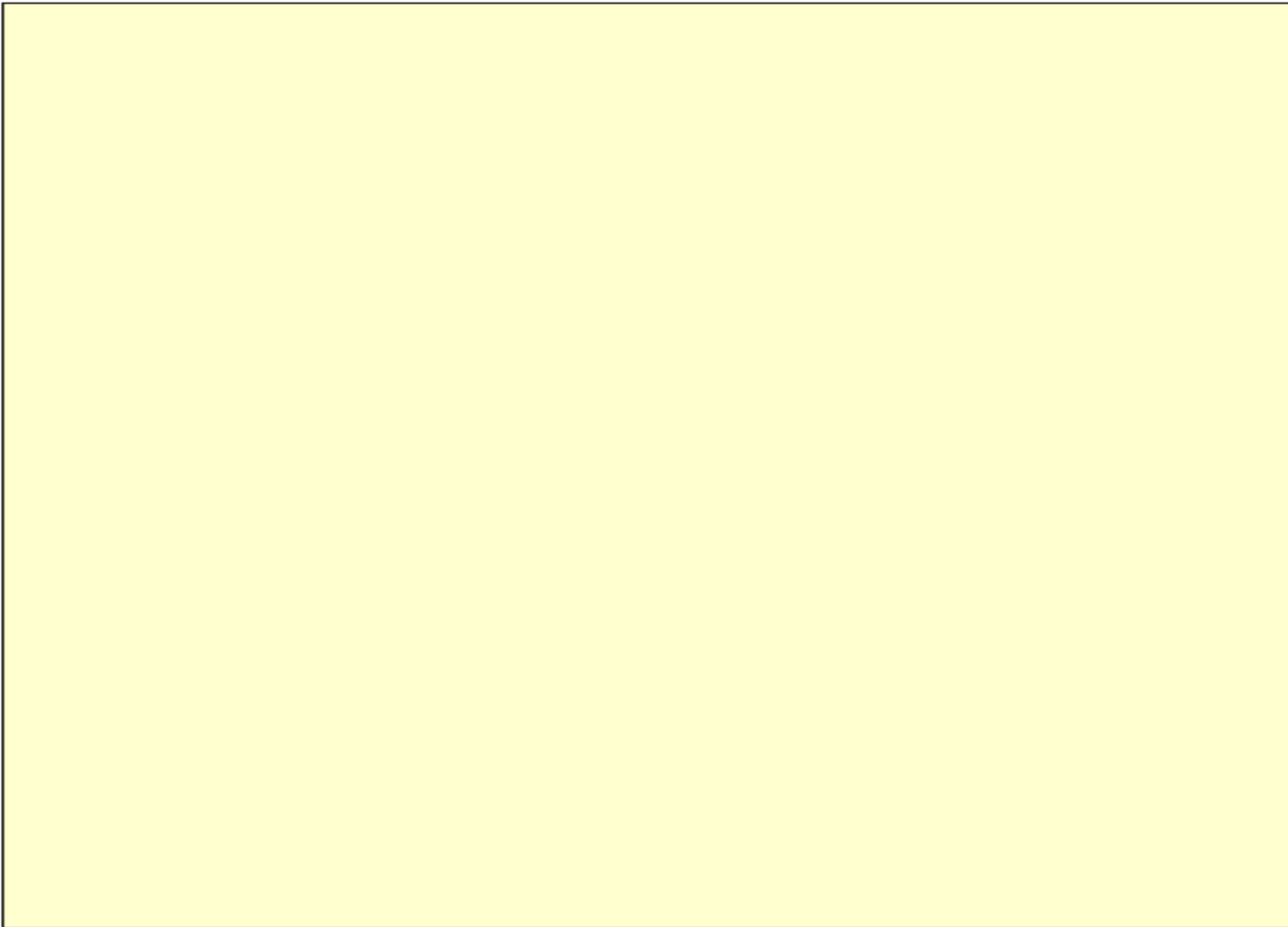
Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

Part V Suspicious Activity Information - Narrative*

[See Instructions](#)



Questions?

Thank You!

Additional Questions? Please contact us:

Fran Sponsler – Direct Line – (303) 382-5220

sponslerf@fbl-cpa.com

Fred Lutz – Direct Line – (303) 382-5229

lutzf@fbl-cpa.com

Val Vought – Direct Line – (303) 382-5235

voughtv@fbl-cpa.com

FORTNER, BAYENS, LEVKULICH
■
& GARRISON, P.C.

1099 18th Street, Suite 2900

Denver, CO 80202

303-296-6033

www.fblg-cpa.com