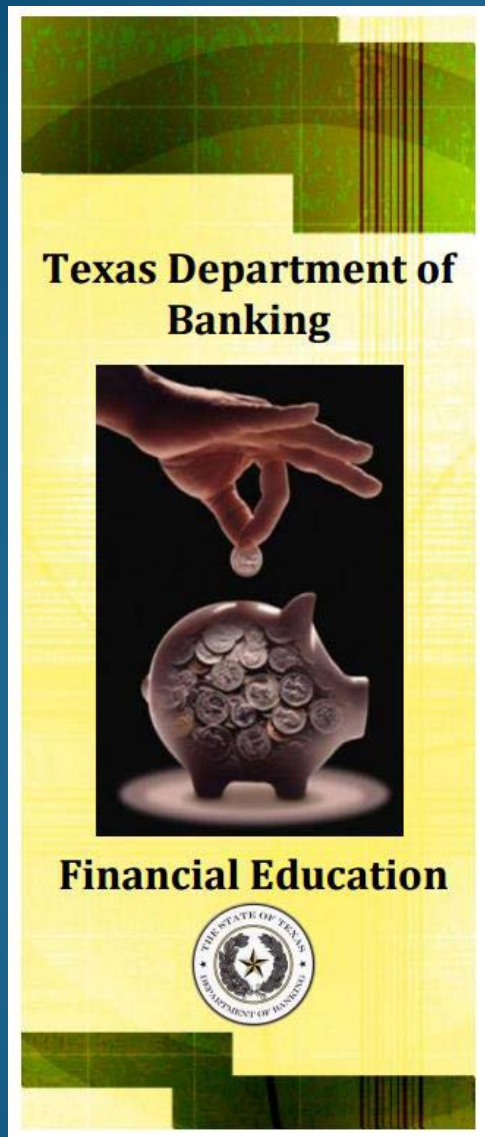


Texas Department of Banking

Guidance on Federal and State Filings for Money Services Businesses

March 23, 2017



Leilani Lim-Villegas
Financial Education Coordinator
Austin, Texas



Texas Department of Banking

March 23, 2017

Sharing State Examination Reports with a Bank

Jesus "Jesse" Saucillo, CAMS
Review Examiner of Special Audits Division



Information Contained in Reports are Confidential

- ★ License holders previously requested authorization to share Reports of Examination (ROEs) with banks

- ★ ROEs are Departmental property that cannot be shared without Departmental authorization
 - Information in ROEs is confidential under Texas Finance Code Section 151.606



Supervisory Memorandum - 1013

- ★ Supervisory Memorandum (SM) – 1013 was issued on February 22, 2016
- ★ Intended to assist license holders in opening or maintaining bank accounts
 - Help address de-risking practices by banks
- ★ Allows for license holders to share Departmental ROEs with banks
 - Demonstrate compliance with state and federal regulations
 - Part of MSB's due diligence documentation



Supervisory Memorandum - 1013

- ★ Prior to sharing ROEs with banks, MSB license holders must take the following two actions
 - Redact any customer personal information as well as any reference to the filing of suspicious activity reports
 - Enter into a written agreement with bank
 - ✓ Must acknowledge that the ROE is confidential under Texas Finance Code Section 151.606
 - ✓ Agrees to take appropriate steps to ensure ROE is confidential



Supervisory Memorandum - 1013

- ★ License holders must maintain a list of every bank it has shared an ROE with
 - A copy of the confidentiality agreement between bank and MSB must also be made available for review

- ★ Banks may not release ROEs with other third parties without written authorization from both Department and MSB

- ★ SM – 1013 only applies to sharing of ROE with banks for maintaining or opening bank account
 - For any other circumstance, license holder must obtain Departmental written authorization to release ROE



Supervisory Memorandum - 1013

- ☆ Applies to ROEs solely issued by the Texas Department of Banking
 - Does not apply to joint examination ROEs
- ☆ For ROEs in connection with joint examinations, the MSB must obtain authorization from each participating state regulator
 - Notably, several states have regulations that prohibit the release of ROEs



Contact Information

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FinCEN CTR and SAR Guidance for Money Services Businesses

Presented By: Anthony Dash
Lead FinCEN Resource Center Specialist
Regulatory Support Section
Liaison Division

What is FinCEN?

The Financial Crimes Enforcement Network (FinCEN) is a bureau of the U.S. Department of the Treasury. FinCEN's mission is to safeguard the financial system from illicit use and combat money laundering and promote national security through the collection, analysis, and dissemination of financial intelligence and strategic use of financial authorities.

Bank Secrecy Act (BSA)

FinCEN exercises regulatory authority over the BSA, which requires financial institutions to maintain appropriate records and file certain reports with regards to currency transactions (CTR) and suspicious activity (SAR). Banks, Credit Unions, Money Services Businesses, Casinos, and Broker/Dealers are some of the financial institutions that are subject to the BSA.

Importance of BSA Data

BSA data that is collected on reports such as CTRs and SARs filed by financial institutions account for a tremendous amount of financial information that is essential to tracing and identifying potential avenues of terrorist financing, money laundering, and other illicit activity. The data extracted from BSA filings is extremely useful to law enforcement agencies, by assisting in identifying and linking investigative information and intelligence with ongoing investigations, as well as in identifying leads for new investigations.

Currency Transaction Report (CTR)

Definitions

- Currency - The coin and paper money of the United States or any other country, which is circulated and customarily used and accepted as money.



- Transaction in Currency - The physical transfer of currency from one person to another. This does not include a transfer of funds by means of bank check, bank draft, wire transfer or other written order that does not involve the physical transfer of currency.

Currency Transaction Report (CTR)

- The FinCEN CTR (Form 112) is required to be filed for each deposit, withdrawal, exchange of currency, or other payment or transfer, by, through, or to the financial institution which involves a transaction in currency of more than \$10,000.
- Multiple transactions must be treated as a single transaction if the financial institution has knowledge that they are conducted by or on behalf of the same person and they result in either currency received (cash in) or currency disbursed (cash out) by the financial institution totaling more than \$10,000 during any one business day.

Transactions that Require a CTR

Only cash transactions that, if alone or when aggregated, exceed \$10,000 should be reported on the FinCEN CTR. Cash In and Cash out transactions shall not offset against one another. If there are both Cash In and Cash Out transactions, the amounts should be considered separately and not aggregated. However, they may be reported on a single FinCEN CTR. If there is a currency exchange, it should be aggregated separately with each of the cash in and cash out totals.

Examples of Reportable Transactions

*Reportable**

Not Reportable

- Example 1:** Robert presents \$11,000 in currency for a money transfer out. He also cashes a check and receives \$3,000 in currency.
(Total Cash In = \$11,000, Total Cash Out = \$3,000)*
- Example 2:** Maria presents \$11,000 in currency for a money transfer out. Later that same day, Maria comes back and cashes a check to receive \$12,000 in currency.
(Total Cash In = \$11,000, Total Cash Out = \$12,000*)*
- Example 3:** Mike presents \$6,000 in currency for a money transfer out. He also cashes a check and receives \$4,000 in currency. Further, he presents \$5,000 in currency to be exchanged for the equivalent in Euro's.
(Total Cash In = \$11,000, Total Cash Out = \$9,000)*
- Example 4:** Cindy presents a check with a face value of \$10,025 that she would like to cash. The MSB that is cashing the check charges her a \$50 fee to cash the check. The MSB deducts their fee and after cashing the check, returns \$9,975 in currency to Cindy.
(Total Cash In = \$0, Total Cash Out = \$9,975)

How to File a CTR

- CTRs must be filed within 15 days from the date of the reportable transaction.
- CTRs as well as other BSA reports can be filed by logging into the BSA E-filing System and filing FinCEN Form 112.
- Visit www.fincen.gov and click the “E-filing” icon

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FBAR (FinCEN 114) Report Foreign Bank and Financial Accounts Filing Information - Due Date April 18, 2017



New Due Date for FBARS

December 16, 2016

FinCEN has announced a new annual due date for filing Reports of Foreign Bank and Financial Accounts (FinCEN Form 114).

FinCEN Fines Western Union Financial Services, Inc. for Past Violations of Anti-Money Laundering Rules In Coordinated Action with DOJ and FTC

January 19, 2017

FBAR Filing Requirement for Certain Financial Professionals

December 16, 2016

[Read More News](#)



Money Services Businesses Information

MSB Registrant Search and MSB Registration



E-Filing

Electronic Filing System for Bank Secrecy Act Forms



SAR Statistics

Interactive Suspicious Activity Report Statistics



BSA E-FILING SYSTEM

FINANCIAL CRIMES ENFORCEMENT NETWORK

BSA Home

Using BSA E-Filing ▼

Take a Tour

File an Individual FBAR

Become a BSA E-Filer

Frequently Asked Questions

Help

Site Map

E-Filing System Login

Welcome to the BSA E-Filing System

The BSA E-Filing System supports electronic filing of Bank Secrecy Act (BSA) forms (either individually or in batches) through a FinCEN secure network. BSA E-Filing provides a faster, more convenient, more secure, and more cost-effective method for submitting BSA forms. [Additional benefits](#) are listed under [Using BSA E-Filing](#).



How does BSA E-Filing work?

The BSA E-Filing System is hosted on a secure website accessible on the Internet. Organizations that file BSA forms with FinCEN can securely access the system after they apply for and receive a user ID and password from FinCEN.



Hot Topics

- ▶ [New Due Date for FBARs](#)
- ▶ [Additional E-Filing Method for FBAR Individual Filers](#)
- ▶ [FBAR Electronic Filing Technical Overview](#)
- ▶ [Informational Webinar: FBAR Electronic Filing Technical Overview](#)

User Quick Links

- ▶ [RMSB Website](#)

FBAR Filers

- ▶ [File an Individual FBAR](#)
- ▶ [Line Item Instructions For Completing the FBAR](#)
- ▶ [FinCEN Form 114\(a\)](#)
- ▶ [FBAR FAQ's](#)

Supervisory Users

- ▶ [Getting Started with BSA E-Filing](#)
- ▶ [Submitting the Supervisory User Application Form](#)
- ▶ [Obtaining Authorization as Supervisory User](#)

General Users

- ▶ [Downloading the Adobe Reader](#)

Batch Filers

- ▶ [FinCEN FBAR Electronic Filing Requirements](#)



BSA E-FILING SYSTEM

FINANCIAL CRIMES ENFORCEMENT NETWORK

BSA E-Filing Home

New to BSA E-Filing

- Next Steps for Using BSA E-Filing

Alerts

- View Alerts

Documentation

- Computer Based Training
- **Frequently Asked Questions**
- Quick Reference
- SDTM Requirements
- Supervisory User Manual
- User Manual

File FinCEN Reports

- Form 8300
- Report 112 - CTRBatch
- **Report 112 - CTR**
- Report 111 - SARBatch
- Report 111 - SAR
- Report 110 - DOEPPatch
- Report 110 - DOEPPatch
- Report 114 - FBARBatch
- Report 114 - FBAR
- Report 107 - RMSB
- Submit FinCEN Report

Welcome to the BSA E-Filing System

You are currently logged in as Anthony Dash. Last login: February 03, 2017 at 11:15:30 AM EST.

The BSA E-Filing System allows you to file BSA forms with FinCEN via a secure Internet connection. BSA E-Filing allows you to receive system alerts and advisories via BSA E-Filing and respond to them by sending secure messages to FinCEN.

To learn how the system works, download and review the BSA E-Filing User Manual, Quick Reference Guide, and/or Supervisory User Manual depending on your role, all three of which are available on the BSA E-Filing Documentation menu to the left. If you have questions that are not resolved by the BSA E-Filing documentation, contact the BSA E-Filing Help Desk at 1-866-346-9478 or BSAEFilingHelp@fincen.gov. The Help Desk regular hours of operation are 8:00 am - 6:00 pm East Coast Time, Monday - Friday. Please note that the Help Desk is closed on Federal holidays.



New to BSA E-Filing? Continue Here...

Currency Transaction Report

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[Step 3. Financial Institution Information](#)


Currency Transaction Report

OMB No. 1508-0084

Version Number: 1.2

Filing Name

*1 Type of filing

☐ Initial report

☐ Correct/amend prior report

☐ FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Submit

Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

Currency Transaction Report

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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

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[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) \$.00

b Payment(s) .00

c Currency received for funds transfer(s) out .00

d Purchase of negotiable instrument (s) .00

e Currency exchange(s) .00

f Currency to prepaid access .00

g Purchases of casino chips, tokens and other gaming instruments .00

h Currency wager(s) including money plays .00

i Bills inserted into gaming devices .00

j Other (specify): .00

Total Cash In \$.00

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

a Withdrawal(s) \$.00

b Advance(s) on credit (including markers) .00

c Currency paid from funds transfer(s) in .00

d Negotiable instrument(s) cashed .00

e Currency exchange(s) .00

f Currency from prepaid access .00

g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments .00

h Payment(s) on wager(s) (including race and OTB or sports pool) .00

i Travel and complimentary expenses and book gaming incentives .00

j Payment for tournament, contest or other promotions .00

k Other (specify): .00

Total Cash out \$.00

26 Foreign Cash In

Foreign Country

+ -

28 Foreign Cash out

Foreign Country

+ -

Currency Transaction Report

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[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.)

Suspicious Activity Report (SAR)

When is SAR filing required?

- Every MSB must file a SAR to report any suspicious transaction or activity it believes to be a possible violation of law or regulation.
- Activity requires reporting if it conducted or attempted by, at, or through the MSB, and involves or aggregates funds or other assets of at least \$2,000.

Confidentiality of SARs

- No MSB, and no director, officer, employee, or agent of any MSB, shall disclose a SAR or any information that would reveal the existence of a SAR.
- Any MSB, and any director, officer, employee, or agent of any MSB that is subpoenaed or otherwise requested to disclose a SAR or any information that would reveal the existence of a SAR, shall decline to produce the SAR or such information, and shall notify FinCEN of any such request and the response thereto.
- 31 CFR 1022.320(d)(1)(ii)(A) explains when revealing SAR and SAR information is not considered prohibited.

What activity prompts a SAR filing?

Activity that:

- Involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity.
- Is designed, whether through structuring or other means, to evade any requirements or regulations under the BSA.
- Serves no business or apparent lawful purpose, and the reporting MSB knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction.
- Involves use of the MSB to facilitate any criminal activity.

Examples of Suspicious Activity

- Fraud
- Structuring
- Terrorist Financing
- Money Laundering
- Embezzlement
- Forgeries
- Identity Theft
- Suspicious funds transfers

How to File a SAR

- SARs must be filed within 30 days from the date that the suspicious activity is detected.
- SARs can be filed by logging into the BSA E-filing System and filing FinCEN Form 111.
- Visit www.fincen.gov and click the “E-filing” icon

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Suspicious Activity Report

OMB No. 1608-0086

Version Number: 1.1

Steps to Submit

1. Complete the report in its entirety with all requested or required data known to the filer.
2. Click "Validate" to ensure proper formatting and that all required fields are completed.
3. Sign with PIN.
4. Click "Save"; filers may also "Print" a paper copy for their records.
5. Click "Submit".

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](#)

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

[Sign with PIN](#)

This PDF is intended for testing purpose only. Please do not use it in a production environment.

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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

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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 ☐ Introducing broker-securities ☐ Subsidiary of financial/bank holding company

☐ Futures Commission Merchant ☐ Investment Adviser ☐ Other

☐ Holding company ☐ Investment company

☐ Introducing broker-commodities ☐ Retail foreign exchange dealer

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

68 State

69 ZIP/Postal Code

70 Country

66 RSSD Number

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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

*4 First name

5 Middle name/initial

Suffix

Gender

*16 Date of birth

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

*16 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 ☐

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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"/> |
| 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"/> |
|--|---|

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"/> |
| 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"/> |
| 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"/> |

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"/> |

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"/> |
| j <input type="checkbox"/> Misuse of position or self-dealing | |

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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) <input type="text"/> |
| 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 | |
| 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) <input type="text"/> |
| b <input type="checkbox"/> Foreign currency | e <input type="checkbox"/> Government payment | h <input type="checkbox"/> Travelers checks | |
| 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

44 IP address (if available)

45 CUSIP® number

Suspicious Activity Report

[Home](#)

[Step 1. Filing Institution
Contact Information](#)

[Step 2. Financial Institution
Where Activity Occurred](#)

[Step 3. Subject
Information](#)

[Step 4. Suspicious
Activity Information](#)

[Step 5. Narrative](#)

Part V Suspicious Activity Information - Narrative*

[See Instructions](#)

- Filers can check the status of their submissions by logging into their BSA E-filing account and clicking “Track Status”.
- Track Status will provide you with a Tracking ID, the status of the submission, and the BSA ID number once one is assigned to the filing.
- If the filing you submitted does not appear in Track Status, it is likely that the submission was not successfully transmitted. You should attempt to submit the completed form again.

Report 114 - FBARBatch

Report 114 - FBAR

Report 107 - RMSB

Submit FinCEN Report

Filing

Manage PIN

Track Organization Status

Track Status

Organization Management

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Manage Organization Information

View FO Enrollment Code

Track Status

Search Filings: Date Range:

Show All

 Tracking ID: BSA ID: Status:

Search

Reset

Filing Name	Filing Type	Date Filed	BSA E-Filing Tracking ID	Number of Documents	Status Date	Status	BSA ID
There is no data to display. Change the search criteria for a new search.							

Rules For MSBs

- The Rules for MSBs under the Bank Secrecy Act can be found in Chapter X of Title 31 within the Code of Federal Regulations.
- 31 CFR 1022 – Rules For Money Services Businesses

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Question and Answer Session

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Copy of presentation available at the Texas Department of Banking website

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