

**1 Supporting Statement for the
Suspicious Activity Report by Depository Institutions
(FR 2230; OMB No. 7100-0212)**

Summary

The Board of Governors of the Federal Reserve System, under delegated authority from the Office of Management and Budget (OMB), proposes to extend, with revision, the interagency Suspicious Activity Report (SAR-DI) (FR 2230; OMB No. 7100-0212). The Federal financial institutions supervisory agencies, the U.S. Departments of Justice and Treasury, and several law enforcement agencies jointly designed this interagency reporting form. It is used by financial institutions to apprise law enforcement authorities of any known or suspected criminal misconduct at financial institutions. As Bank Secrecy Act (BSA) administrator, the Department of Treasury's Financial Crimes Enforcement Network (FinCEN) is transitioning from industry specific paper forms to electronic submissions. Based on type, financial institutions (depository institutions, broker-dealers in securities, futures commission merchants and introducing brokers in commodities, insurance companies, mutual funds, money services businesses, and casinos) currently provide data on four separate forms. FinCEN has proposed to have one electronically-filed dynamic and interactive BSA-SAR that would be used by all filing institutions to report suspicious activity as of April 1, 2013.

The Federal Reserve proposes several new data fields, including data fields from the SARs of other industries. On March 29, 2012, FinCEN released guidance¹ titled, "Filing FinCEN's new Currency Transaction Report and Suspicious Activity Report," which was developed in consultation with staff of the financial institution supervisory agencies.² The Guidance clarified the agencies' expectations and added more specific data elements (i.e., characterizations of suspicious activity and types of financial services) as a more efficient way to bring information about suspicious activity to FinCEN's and law enforcement's attention. As discussed in the guidance, financial institutions would not be expected to revise internal programs, or develop new programs, to capture information that reflects the new and expanded data elements. The current total annual burden for Federal Reserve supervised institutions is estimated to be 93,010 hours and would increase to 139,515 hours with the proposed revisions. Detail about the new BSA-SAR reporting form is included as Attachment 1.

There are no proposed changes to the regulatory reporting criteria for submitting the data. Institutions will continue to follow Regulation H – 12 CFR 208.62, interagency guidance, and filing instructions to determine when a report should be filed and what information should be included on the report.

1 http://www.fincen.gov/statutes_regs/guidance/pdf/FIN-2012-G002.pdf

2 The Board, Conference of State Bank Supervisors, Commodity Futures Trading Commission, Federal Deposit Insurance Corporation, Internal Revenue Service, National Credit Union Association, Office of the Comptroller of the Currency, Securities and Exchange Commission

Background and Justification

Since 1996, the federal banking agencies³ and FinCEN have required certain types of financial institutions to report known or suspected violations of law and suspicious transactions. To fulfill these requirements, supervised banking organizations file SARs.⁴ Law enforcement agencies use the information submitted on the reporting form to initiate investigations and the Federal Reserve uses the information in the examination and oversight of supervised institutions.

The Federal Reserve's suspicious activity reporting rules apply to state member banks, bank holding companies and their nonbank subsidiaries, Edge and agreement corporations, and the U.S. branches and agencies, representative offices, and nonbank subsidiaries of foreign banks supervised by the Federal Reserve. The Federal Reserve is only responsible for the paperwork burden imposed on these institutions. Other federal banking agencies account for the paperwork burden for the institutions they supervise. The annual burden per respondent varies depending on the nature of the activity being reported. Based on December 31, 2011, data submitted, the current total annual burden for Federal Reserve supervised institutions is estimated to be 93,010 hours.

The suspicious activity report filing requirement became effective on April 1, 1996. Prior to the effective date, the Federal Reserve, the other federal banking agencies, and FinCEN each issued new and nearly identical rules mandating the use of the interagency SAR-DI for the reporting of suspicious activities. In separate actions, FinCEN also enacted regulations requiring other types of financial institutions, such as brokers or dealers in securities and futures; money services businesses (money transmitters; issuers and sellers of money orders and travelers' checks; check cashers, and dealers in foreign exchange); casinos and card clubs; and insurance companies to file reports on suspicious activities.

In January 2003, check boxes were added to Part III of the SAR-DI to note terrorist financing and identity theft as suspicious activities and the safe harbor language in the instructions was updated to reflect changes made by the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT) Act of 2001. In 2006, the SAR-DI form was revised to support a new joint filing initiative aimed at reducing the total number of duplicate reports filed for a single suspicious transaction. On May 1, 2007, FinCEN published a *Federal Register* notice (72 FR 23891)⁵ announcing the delayed implementation of these revisions, which ultimately were never implemented.

On July 15, 2011, FinCEN received final approval of the BSA-SAR⁶ from the Office of Management and Budget which concluded FinCEN's October 15, 2010, request for comment.

3 The Board, the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, and the National Credit Union Administration.

4 In 1996, the Federal Reserve together with the other federal banking agencies issued nearly identical regulations to implement the SAR process for banking organizations.

5 http://www.fincen.gov/statutes_regs/frn/pdf/sar_fr_notice.pdf

6 http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201104-1506-002

On July 13, 2012, the Federal Reserve published a final *Federal Register* notice (77 FR 41405)⁷ announcing the extension for three years, without revision, of the FR 2230. This renewal was necessary because the current SAR-DI form will continue to be accepted by FinCEN until March 31, 2013.

Description of Information Collection

State member banks, bank holding companies and their nonbank subsidiaries, Edge and agreement corporations, and the U.S. branches and agencies, representative offices, and nonbank subsidiaries of foreign banks supervised by the Federal Reserve follow the SAR instructions to determine when a SAR should be filed and what information should be included on the SAR.

Reporting Criteria

A banking institution must report certain known or suspected violations of federal law and suspicious transactions. An institution is generally required to file a SAR with respect to:

- Suspicious activity of any amount involving an insider,
- Violations aggregating \$5,000 or more where a suspect can be identified,
- Violations aggregating \$25,000 or more regardless of a potential suspect, or
- Violations aggregating \$5,000 or more that involve potential money laundering or violations of the Bank Secrecy Act.

An institution need not file a SAR for an attempted or committed burglary or robbery reported to the appropriate law enforcement agencies.

Proposed Revisions

The BSA-SAR would integrate four institution-specific SARs into one data collection. The previous five parts of the SAR-DI remain with changes to their titles and order of completion. Fields from other industry SARs that may be new to depository institutions as well as specific data fields that are new to all types of industry filers have been identified. Please see Attachment 1 for a detailed listing of all the proposed revisions.

Legal Status

The Board's Legal Division has determined the SAR is required by law, pursuant to authority contained in the following statutes: 12 U.S.C. 248(a)(1), 625, 1818, 1844(c), 3105(c) (2), and 3106(a). The obligation to file a SAR is set forth in the Board's rules, and is mandatory:

- state member banks: 12 C.F.R. 208.62(c),
- entities subject to the Bank Holding Company Act and their nonbank subsidiaries: 12 C.F.R. 225.4(f),
- Edge and agreement corporations: 12 C.F.R. 211.5(k), and
- U.S. branches, agencies, and representative offices of foreign banks: 12 C.F.R. 211.24(f).

⁷ http://www.federalreserve.gov/reportforms/formsreview/FR2230_20120713_ffr.pdf

Section 5318(g)(2)(A)(ii) of Title 31 generally prohibits an officer or employee of the Federal Government from disclosing the existence of a SAR to anyone involved in the transaction, and section 5319 of Title 31 provides that SARs are exempt from disclosure under FOIA. The information collected on a SAR is covered by, among other things, exemptions 3 and 7 of the Freedom of Information Act (5 U.S.C. 552(b)(3)&(7)) and exemption 2 of the Privacy Act (5 U.S.C. 552a(k)(2))

Time Schedule for Information Collection

The SAR rules require that a SAR be filed no later than 30 calendar days from the date of the initial detection of facts that may constitute a basis for filing a SAR. If no suspect can be identified, the time period for filing a SAR is extended to 60 days. Respondents file online: <http://bsaefiling.fincen.treas.gov/main.html>.

Consultation Outside the Agency

As set forth above, the SAR was originally developed in 1996 by an interagency group that consisted of the federal banking agencies, the U.S. Departments of Justice and Treasury, and several law enforcement agencies. The general framework of the BSA-SAR report and revisions to the BSA-SAR data elements have been discussed on an interagency basis.

On December 5, 2012, the Federal Reserve published a notice in the *Federal Register* (77 FR 72349) requesting public comment for 60 days on the extension, with revision, of the interagency Suspicious Activities Report by Depository Institutions. The comment period for this notice expired on February 4, 2013. The Federal Reserve did not receive any comments. The revisions will be implemented as proposed. On February 19, 2013, the Federal Reserve published a final notice in the *Federal Register* (78 FR 11646).

Estimate of Respondent Burden

The burden per institution varies depending on the nature of the activity being reported. Because of these changes, the Federal Reserve estimates the average burden would increase to 1.5 hours per response. Between January 1, 2011, and December 31, 2011, 6,000 state member banks, bank holding companies, Edge and agreement corporations, and U.S. branches and agencies, representative offices, and nonbank subsidiaries of foreign banks filed 93,010⁸ SAR-DIs. Based on these data the annual reporting burden for the Federal Reserve regulated entities is estimated to be 93,010 hours and would increase to 139,515 hours with the proposed revisions. The proposed burden represents just over 1 percent of total Federal Reserve System paperwork burden.

8 [The SAR Activity Review - By the Numbers: Issue 17](#)

	<i>Number of respondents</i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<i>Current</i>	6,000	15.5017	1.0	93,010
<i>Proposed</i>	6,000	15.5017	1.5	<u>139,515</u>
<i>Difference</i>				+46,505

The total cost to the public is estimated to be \$4,171,499 and would increase to \$6,257,248⁹

Sensitive Questions

This reporting form contains no questions of a sensitive nature, as defined by OMB guidelines.

Estimate of Cost to the Federal Reserve System

The cost to the Federal Reserve System is negligible. The Federal Reserve, as well as the other federal supervisors of financial institutions, distributes the reporting form in electronic format. The Federal Reserve System has minimal data collection costs associated with SAR filings, as the filings go directly to FinCEN which acts as the data base manager for the federal banking agencies and makes the information available to the Federal Reserve electronically.

⁹ Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rate (30% Office & Administrative Support @ \$17, 45% Financial Managers @ \$52, 15% Legal Counsel @ \$55, and 10% Chief Executives @ \$81). Hourly rate for each occupational group are the median hourly wages (rounded up) from the Bureau of Labor and Statistics (BLS), Occupational Employment and Wages 2011, www.bls.gov/news.release/ocwage.nr0.htm Occupations are defined using the BLS Occupational Classification System, www.bls.gov/soc/

Attachment 1

Detail of proposed revisions to the interagency Suspicious Activity Report (SAR-DI) (FR 2230; OMB No. 7100-0212)

Proposed Revisions

The BSA-SAR would integrate four institution-specific SARs into one data collection. The previous five parts of the SAR-DI remain with changes to their titles and placement in order of completion.

The proposed BSA-SAR is described below by form Part. Fields from other industry SARs that may be new to depository institutions as well as specific data fields that are new to all types of industry filers have been identified. In the description provided below, questions for which an answer must be provided (referred to as “critical fields”) are identified with the * symbol in front of the data element number.

Type of Filing

Field 1 is the **Type of Filing** and it would require the filer to designate the category that best describes the filing from the choices of:

- * 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/file number if 1b or 1c are checked

On the current SAR-DI there is only one choice in data field 1 for those reports that corrected a prior report.

Part I: Subject Information

Part I is titled **Subject Information** and would require the filer to provide information for *each* subject involved in the suspicious activity. Subject Information is titled *Suspect Information* on the current SAR-DI. As with the existing SAR-DI, multiple subjects may be included in Part I.

Each of the critical fields (*) in this Part have a new check box that may be used if the information is unknown. If that box is checked, the filer would not need to enter any information in that field.

In Part I, with the exception of the unknown check box, these data fields would remain the same with no additions or changes from the SAR-DI:

- * 3. Individual’s last name or entity’s legal name – a. (check if) unknown
- * 4. First name – a. (check if) unknown
- 5. Middle initial (middle name for electronic filers)
- 7. Occupation or type of business

- * 8. Address – a. (check if) unknown
- * 9. City – a. (check if) unknown
- * 10. State – a. (check if) unknown
- * 11. ZIP/Postal Code – a. (check if)
- * 12. Country Code – a. (check if) unknown
- * 13. TIN – a. (check if) unknown
- * 16. Date of birth mm/dd/yyyy – a. (check if) unknown

Listed below are the remaining data fields in Part I that would be considered new data fields or data fields that would be modified.

- 2. Check – a. If entity; b. If all critical (*) subject information is unavailable (If 2b is checked this Part may be left blank)
- 5a. Gender – b. (Check if) Male; c. (Check if) Female; d. (Check if) Unknown
- 6. Alternate name, e.g. AKA for an Individual or DBA for an Entity
- 7a. NAICS Code (North American Industry Classification system code that corresponds to 7)
- 14. TIN type (* if 13 is completed) – a. EIN; b. SSN–ITIN; c. Foreign
- * 15. Form of identification for subject – a. (check if) unknown (or not obtained); 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
- 17. Phone number type – a. (check if) Home; b. (check if) Work; c. (check if) Mobile; d. (check if) Fax
- 18. Phone number – a. Extension (if any)
- 19. E-mail address (if available)
- 19 a. Web site (URL) address (if available)
- 20. Corroborative statement to filer? – a. (check if) Yes; b. (check if) No (This was Admission/Confession on the SAR-DI)
- 21. Relationship of the subject to the filing institution (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
- 22. If item 21h, 21i, 21j, or 21k is checked, indicate status of relationship – a. (check if) Relationship continues; b. (check if) Terminated; c. (check if) Suspended/barred; d. (check if) Resigned
- 23. Action date if 22 b, c, or d is checked
- * 24. Financial Institution EIN 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;
- 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

Part II – Suspicious Activity Information

Part II, **Suspicious Activity Information**, would require the filer to describe the suspicious activity that occurred.

Part II items would cover all filer institution types so all filers would see field options that may not pertain to their report (such as casino activities). Filers would only be required to complete those items that apply to their institution and pertain to the report being filed.

In Part II, with the exception of the unknown check box, these data fields would remain the same as the current SAR-DI:

- * 27. Date or date range of suspicious activity for this report – a. From: mm/dd/yyyy; b. To: mm/dd/yyyy

The remaining data fields in this Part, specifically the characterizations of suspicious activity, would be modified and expanded when compared to the current SAR-DI. There are now ten general categories and each category would be further broken down to specific types of suspicious activity.

- * 26. Amount involved in this report – a. (check if) Amount unknown; b. (check if) No amount involved.
- 28. Cumulative amount only if box 1c (continuing activity report) is checked
- 29. Structuring – a. Alters transaction to avoid BSA recordkeeping requirement; b. Alters transactions 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 (Type) – 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

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 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 instrument/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)
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 check; i. U.S. Currency; z. Other (specify type in space provided)
41. Commodity type (if applicable)
42. Product/Instrument description (if needed)
43. Market where traded (list of codes will be provided—dropdown menu for electronic filers)
44. IP Address (if available) (multiple entries allowed for electronic filers)
45. CUSIP number (multiple entries allowed for electronic filers)
46. CUSIP number (multiple entries allowed for electronic filers)

Part III – Information about Financial Institution Where Activity Occurred

Part III information would be about the financial institution(s) where the suspicious activity occurred. A separate Part III record would be completed on each financial institution

involved in the suspicious activity. The data fields in Part III would be modified and expanded when compared to the current SAR-DI.

- * 47. Type of financial institution (check only one) – a. Casino/Card club; b. Depository institution; c. Insurance company; d. MSB; e. Securities/Futures; z. Other (specify type of institution in space provided)
- * 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); Z = Not Applicable
- 49. If item 47a is checked indicate type (Check only one) – a. State licensed casino; b. Tribal authorized casino; c. Card club; d. Other (specify)
- 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 Advisor; 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*)
- 51. Financial institution identification number (Check one box to indicate type) – a. (check if) CRD number; b. (check if) IARD number; c. (check if) NFA number; d. (check if) RSSD number; e. (check if) SEC number; f. Identification number
- 52. Financial institution's role in transaction (if applicable) – a. (check if) Selling location; b. (check if) Paying location; (check if) Both a & b
- * 53. Legal name of financial institution – a. (check if) unknown
- 54. Alternate name, e.g., AKA – individual or trade name, DBA – entity
- * 55. TIN – a. (check if) unknown
- 56. TIN type (* if 55 is completed) – a. EIN; b. SSN-ITIN; c. Foreign
- * 57. Address – a. (check if) unknown
- * 58. City – a. (check if) unknown
- 59. State
- * 60. ZIP/Postal Code – a. (check if) unknown
- * 61. Country
- 62. Internal control/file number
- 63. Loss to financial institution (if applicable)
- 64. Branch's role in transaction (if applicable) – a. (check if) Selling location; b. (check if) Paying location; c. (check if) Both a & b
- * 65. Address of branch or office where activity occurred – a. (if no branch activity involved, check box a)
- 66. RSSD number (of the branch)
- 67. City
- 68. State
- 69. ZIP/Postal Code
- 70. Country (2 letter code – list provided)

Part IV – Filing Institution Contact Information

Part IV information would be about the lead financial institution or holding company that is filing the BSA-SAR. There would be only one Part IV record for each filing. Part IV would take fields previously contained in Part I, Part III, and Part IV on the SAR-DI as well as added new fields.

- * 78. 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); Z = Not Applicable
- * 79. Filer name (Holding company, lead financial institution)
- * 80. TIN
- * 81. TIN type – a. EIN; b. SSN/ITIN; c. Foreign
- * 82. Type of financial institution (check only one) – a. Casino/Card club; b. Depository institution; c. Insurance company; d. MSB; e. Securities/Futures; z. Other (specify type of institution in space provided)
- 83. Type of Securities and Futures institution or individual filing this report-check box(es) for function 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)
- 84. Filing institution identification number (Check one box to indicate type) – a. (check if) CRD number; b. (check if) IARD number; c. (check if) NFA number; d. (check if) RSSD number; e. (check if) SEC number; f. Identification 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 – a. Extension (if any)
- 95. LE contact date
- * 96. Designated contact office
- * 97. Designated contact office phone number including area code – a. Extension (if any)
- * 98. Date filed

Part V - Suspicious Activity Information Explanation/Description

Part V would require the filer to provide a chronological and complete narrative account of the activity, including what is unusual, irregular, or suspicious about the activity. In the BSA-SAR this part would be a text file that is limited to 17,000 characters (approximately six pages). Institutions may, but are not required to, attach a MS Excel-compatible file (no larger than 1 MB) providing details in tabular form of transactions subject to the suspicious activity discussed in the text file.