

Attachment C - Electronic Filing Instructions

The following instructions apply only to the electronic filing of the FinCEN Currency Transaction Report (FinCEN CTR), FinCEN 112, through FinCEN's BSA E-Filing System. Unless specifically mentioned in the text, these instructions do not apply to any other current or prior Bank Secrecy Act reports.

Filing Prohibition

The FinCEN CTR should not be filed for suspicious transactions involving \$10,000 or less in currency or to note that a transaction of more than \$10,000 is suspicious. Any suspicious or unusual activity should be reported by a financial institution using the FinCEN Suspicious Activity Report (FinCEN SAR), FinCEN 111. If a transaction is suspicious and in excess of \$10,000 in currency, then both a FinCEN CTR and a FinCEN SAR must be filed. In situations involving suspicious transactions requiring immediate attention, such as when a reportable transaction is ongoing, the financial institution shall immediately notify, by telephone, appropriate law enforcement and regulatory authorities in addition to filing a timely FinCEN SAR.

General Instructions

1. Who must file: Each financial institution (other than the U.S. Postal Service, for which there are separate rules) must file a FinCEN CTR 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 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. For a bank, a business day is the day on which transactions are routinely posted to customers' accounts, as normally communicated to depository customers. The business day for casinos is based on the gaming day, which is the normal business day of the casino by which it keeps its books and records for business, accounting, and tax purposes. For all other financial institutions, a business day is a calendar day. Generally, financial institutions are defined as banks, other types of depository institutions, casinos and card clubs, brokers or dealers in securities, money transmitters, currency exchangers, check cashers, and issuers/sellers/payers of money orders and traveler's checks. Only those casinos, gambling casinos, or card clubs in the United States that have gross annual gaming revenues in excess of \$1 million are financial institutions for purposes of the FinCEN CTR. The FinCEN CTR should not be used to report receipts of currency in excess of \$10,000 by any non-gaming businesses of a casino (e.g., a hotel). Instead,

such transactions should be reported on Form 8300, Report of Cash Payments Over \$10,000 Received in a Trade or Business. Casinos, (gambling casinos, or card

clubs) with gross annual gaming revenues that are less than \$1 million are not financial institutions for purposes of the FinCEN CTR and should report all transactions in currency greater than \$10,000 on Form 8300. Additional information on financial institutions required to report currency transactions is found in 31 CFR Chapter X.

2. Casino filing exceptions: A casino does not have to report transactions with:

- domestic banks; or
- currency dealers or exchangers, or check cashers, as defined in 31 C.F.R. § 1010.100(ff), and which are conducted pursuant to a contractual or other agreement covering the financial services in 31 C.F.R. 1021.311(a)(8), 1021.311(b)(7), and 1021.311(b)(8).

Also, a casino does not have to report the following types of transactions:

- Cash ins when they are the same physical currency previously wagered in a money play on the same table game without leaving the table;
- Bills inserted into electronic gaming devices in multiple transactions (unless a casino has knowledge pursuant to 31 C.F.R. 1021.313);
- Cash outs won in a money play when they are the same physical currency wagered, (However, when a customer increases a subsequent cash bet (*i.e.*, money play), at the same table game without departing, the increase in the amount of the currency bet would represent a new bet of currency and a transaction in currency) or,
- Jackpots from slot machines or video lottery terminals.

3. Where to file: The FinCEN CTR must be filed electronically through the Financial Crimes Enforcement Network (FinCEN) BSA E-Filing System. To obtain an application to file electronically, go to <http://bsaefiling.fincen.treas.gov/main.html>. For help in applying, contact the E-Filing Help Desk by calling 1-866-346-9478 (option 2) or via e-mail sent to BSAEFilingHelp@fincen.gov.

4. When to file: A FinCEN CTR must be filed by the 15th calendar day after the day of the transaction as defined in General Instruction 1.

5. Identification requirements: All individuals (except employees of an armored car service operating as an agent of the reporting financial institution) conducting reportable transactions for themselves or for another person, must be identified by means of an official document. Acceptable forms of identification include driver's license, military or military/dependent identification card, passport, state issued identification card, foreign cedula card, non-resident alien identification card, or any other identification document which contains name and preferably address and a photograph and is normally acceptable by financial institutions as a

means of identification when cashing checks for persons other than established customers. Acceptable identification information obtained previously and maintained in the financial institution's records may be used. For example, if documents verifying an individual's identity were examined and recorded on a signature card when an account was opened, the financial institution may rely on that information. In completing the FinCEN CTR, the financial institution must indicate on the report the type, number, and issuer of the identification. Statements such as "known customer" or "signature card on file" are prohibited and are not sufficient for report completion. The actual identifying information must be provided.

For casino customers granted accounts for credit, deposit, or check cashing, or on whom a FinCEN CTR containing verified identity has been filed, acceptable identification information obtained previously and maintained in the casino's internal records may be used as long as the following conditions are met. The customer's identity is re-verified periodically, any out-of-date identifying information is updated in the internal records, and the date of each re-verification is noted on the internal record. For example, if documents verifying an individual's identity were examined and recorded on a signature card when a deposit or credit account was opened, the casino may rely on that information as long as it is re-verified periodically. The actual identifying information must be provided. Statements that the identifying information is on file are prohibited.

When a financial institution has through customer identification program or other requirements verified the identity of an entity involved in reported transactions, the financial institution must record the details of that identification in Item 20 "Form of identification used to verify identity." Such identification can involve collection and retention of documents such as articles of incorporation, business licenses, partnership agreements, or trust documents, and may also involve non-documentary verifications such as site visits, armored car serial numbers or Department of Transportation registration numbers, and private verification services.

6. Penalties: Civil and criminal penalties are provided for failure to file a FinCEN CTR or to supply information, or for filing a false or fraudulent FinCEN CTR. See 31 U.S.C. 5321, 5322 and 5324.

7. Definitions: For purposes of this FinCEN CTR, the terms below have the following meanings:

ATM - An electronic telecommunications device that enables the customers of a financial institution to perform financial transactions, particularly cash deposits or withdrawals, without the need for a human cashier, clerk or bank teller. Cash transactions conducted at an ATM are reportable by the owner of the ATM.

Branch - a transaction location (such as an office or ATM) owned or operated by a financial institution through which the currency transaction was conducted and operated independently from the financial institution's headquarters.

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

Person - An individual, corporation, partnership, trust or estate, joint stock company, association, syndicate, joint venture or other unincorporated organization or group.

Entity - Person other than an individual.

Shared branching - A transaction conducted by a financial institution on behalf of another financial institution that are both a member of a co-operative network (this option applies only to credit unions that are members of a cooperative).

Note: The following definition is provided as an example/aid for non-depository institutions subject to FinCEN CTR filing requirements.

Teller - a non-industry-specific term that refers to an employee that conducts in-person cash transactions with customers, account holders or third parties on behalf of the financial institution. This definition does not apply to "back office" or vault managers/personnel. Different industries may have different terms of art to describe this function for example, within the casino/card club industry the person performing a teller-like function may be referred to as a cashier, cage operator, floor manager, or pit boss. In the MSB industry, the teller-like function may be referred to as a cashier, customer service representative, store/branch manager, clerk etc.

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.

Negotiable Instruments - All checks and drafts (including business, personal, bank, cashier's and third-party), money orders, and promissory notes. For purposes of this FinCEN CTR, all traveler's checks shall also be considered negotiable instruments whether or not they are in bearer form.

Exchange rate - The amount of a foreign currency that can be exchanged for a U.S. Dollar. If foreign currency is a part of a currency transaction that requires the completion of a FinCEN CTR, use the exchange rate in effect for the business day of the transaction to compute the

amount, in U.S. Dollars, to enter in Items 26 and 28. The source of the exchange rate that is used will be determined by the reporting institution.

8. Recording information: Complete each FinCEN CTR by providing as much information as possible. Although all items should be completed fully and accurately, items marked with an asterisk (*) must be completed. Filers must follow the instructions for these items by providing the required data or, if instructions permit, by checking the box labeled "Unknown" to indicate that the required data was unknown or not applicable. Items that do not begin with an asterisk must be completed if the data are known and will be left blank if the data are unknown. If an item's instructions differ from this general instruction, the item instructions must be followed. Items without an asterisk must be completed if the filer has the data and will be left blank when such data are unknown. This instruction supersedes all prior instructions or guidelines issued by FinCEN on use of special responses in BSA forms when information is unknown or not available. Therefore, the use in a FINCEN CTR of special responses such as "UNKNOWN," "NONE," "NOT APPLICABLE," or "XX" and their variants is prohibited. Instructions for any previous version of the Currency Transaction Report do not apply to the FinCEN CTR.

--

NOTE: Throughout these instructions the phrases "check box," "select option," and similar wording are used to denote actions in certain data items on the discrete FinCEN CTR. These are deemed equivalent to instructions in the Electronic Filing Requirements to enter appropriate codes in the same data items in XML-format transmission files.

9. Corrected or amended reports: A corrected report must be filed whenever errors are discovered in a previously-filed FinCEN CTR. Amended reports on FinCEN CTRs must be filed whenever additional data about the transactions are discovered. Both corrected and amended reports must be completed in their entirety, with the necessary corrections or amendments made to the data. In both cases box 1b "Correct/amend prior report" must be checked on the FinCEN CTR. Field 1d must contain the BSA Identifier (BSA ID) assigned to the prior filing. If the BSAID is unknown, enter all zeros in this field. If the FinCEN CTR corrects or amends a FinCEN CTR field not present or completed on the prior filing that field must be completed by the filer if the data are known. These instructions supersede all prior instructions and guidance on electronic filing of amended or corrected FinCEN CTRs. BSA IDs are provided in acknowledgement records sent to member financial institutions by the BSA E-Filing System.

10. Addresses: For addresses in the U.S., Canada, or Mexico enter the permanent street address, city, state code abbreviation (including military/province/territory abbreviation), ZIP Code or foreign postal code, and two letter country code (as listed in ISO 3166-2). Provide the apartment number or suite number, if known, following

the street address. A non-location address such as a post office box or rural route number should be used only if no other street address information is available. ZIP Codes must be five or nine digits. ZIP Codes and foreign postal codes must be entered without formatting or special characters such as spaces or hyphens. For example, the ZIP Code 12354-6120 would be entered as 123546120. The foreign postal code HKW 702 would be entered HKW702. For other foreign addresses (other than Canada or Mexico) enter the street address, city, postal code, and two letter country code (as listed in ISO 3166-2) or address equivalent (leave the state item blank, including the "Unknown" box). If a foreign address contains address information that does not conform to the FinCEN CTR address format, record equivalent address information in the FinCEN CTR address items (except state) and ignore non-conforming data. Complete any address item that is known, even if the entire address is unknown. No abbreviations are permitted in city names, which must be completely spelled out. A U.S. city name should match the city name used by the U.S. Postal Service for the associated state and ZIP Code.

NOTE: Entries in state and country fields must conform to the following requirements:

- United States state/military/territory codes must adhere to the two-letter codes used by the United States Postal Service.
- Canadian province/territory codes must adhere to the two-letter codes used by the Canadian Post Corporation.
- Mexican state/federal district codes must adhere to the standards of ISO 3166-2:MX.
- Country codes including United States territory codes recorded in country fields must adhere to the standards of ISO 3166-2.

11. Telephone numbers: Record all telephone numbers, both foreign and domestic, as a single number string without formatting or special characters such as parentheses, spaces, or hyphens. For example, a number in the format (NNN) NNN-NNNN would be recorded as NNNNNNNNNN. If known, provide the telephone extension number in the associated field. Telephone numbers that are part of the North American Numbering Plan used by the U.S., Canada, many Caribbean countries, and present/former U.S. Pacific island protectorates must be a 10-number entry consisting only of an area code and seven-digit telephone number. Other foreign telephone numbers should include the country number code. If only a partial telephone number is known, record that number in the phone number item.

12. Identifying numbers: Enter all identifying numbers as a single alpha/numeric text string without formatting such as spaces or special characters such as hyphens or periods. An identifying number in the format NNN-NN-NNNN would be entered as NNNNNNNNNN. Such numbers may include letter and number characters. Common identifying numbers include account numbers, alien registration numbers, driver's license and state identification numbers, Employer Identification Numbers (EIN), passport numbers, Social Security Numbers (SSN), and industry specific identifiers such as National Futures Association (NFA) numbers and Central Registration Depository (CRD) numbers. Do not include characters that are not part of the actual identifying number. For example, account number entries must consist only of the account number numeric characters as recorded on checks, account statements, credit bureau reports, etc. Additional characters such as special characters, leading zeros, prefixes, and suffixes appended to account numbers for internal financial institution purposes are prohibited.

13. Monetary amounts: Record all U.S. Dollar amounts rounded up to the next whole dollar. The amount \$15,265.25 would be recorded as \$15,266. A foreign currency amount can only be recorded in Item 26 "Foreign cash in" or Item 28

“Foreign cash out,” again rounded up to the next whole amount. When converting a foreign currency to dollars use an exchange rate for the date of the transaction.

14. Determining whether transactions meet the reporting threshold:

Only cash transactions that, if alone or when aggregated, exceed \$10,000 should be reported on the FinCEN CTR. Transactions shall not be offset against one another. A corrected FinCEN CTR can be filed on an amount below the reporting threshold in cases where the prior FinCEN CTR’s total cash in or total cash out was incorrect and the actual amount was below the threshold. A filer can use the discrete FinCEN CTR if the filer’s batch-file reporting system will not allow such a corrected report to be filed. If there are both Cash In and Cash Out transactions that are reportable, 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.

Example 1: A person deposits \$11,000 in currency to his savings account and withdraws \$3,000 in currency from his checking account. The FinCEN CTR should be completed as follows:

Item 25 “Total cash in” is \$11,000, with no entry in Item 27 “Total cash out.” This is because the \$3,000 transaction does not meet the reporting threshold.

Example 2: A person deposits \$11,000 in currency to his savings account and withdraws \$12,000 in currency from his checking account. The FinCEN CTR should be completed as follows:

Item 25 “Total cash in” is \$11,000. Item 27 “Total cash out” is \$12,000. This is because there are two reportable transactions. However, one FinCEN CTR may be filed to reflect both.

Example 3: A person deposits \$6,000 in currency to his savings account and withdraws \$4,000 in currency from his checking account. Further, he presents \$5,000 in currency to be exchanged for the equivalent in Euro’s. The FinCEN CTR should be completed as follows:

Item 25 “Total cash in” is \$11,000, with no entry in Item 27 “Total cash out.” This is because in determining whether the transactions are reportable, the currency exchange is aggregated with each of the Cash In and Cash Out amounts. The result is a reportable \$11,000 cash in transaction. The total cash out amount is \$9,000, which does not meet the reporting threshold. Therefore, the cash out amount is not entered on the FinCEN CTR.

Example 4: A person deposits \$6,000 in currency to his savings account and withdraws \$7,000 in currency from his checking account. Further, he presents \$5,000 in currency to be exchanged for the equivalent in Euros. The FinCEN CTR should be completed as follows:

Item 25 “Total cash in” is \$11,000. Item 27 “Total cash out” is \$12,000. This is because in determining whether the transactions are reportable, the currency exchange is aggregated with each of the Cash In and Cash Out amounts. In this example, each of the Cash In and Cash Out totals exceeds \$10,000 and must be reflected on the FinCEN CTR. The amount of Euros received in the currency exchange would be entered in Item 28 Foreign Cash Out.

15. Prohibited words and phrases: Do not use the following words or variations of these words in fields:

- a. AKA
- b. COMPUTER GENERATED
- c. CUSTOMER

- d. DBA
 - e. NONE
 - f. NOT APPLICABLE
-
-

- g. NON CUSTOMER
- h. OTHER
- i. SAME
- j. SAME AS ABOVE
- k. SEE ABOVE
- l. SIGNATURE CARD
- m. UNKNOWN
- n. VARIOUS
- o. XX

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

Item Instructions

NOTE: Critical fields in the FinCEN CTR are identified with the * symbol in front of the data element number. Critical fields must be completed by the filer, either by providing the requested data or by checking the "Unknown" box when that option is available. Non-critical fields must be completed when the filer has the data and will be left blank when the data are unknown or do not apply. For example, Item *1 "Type of filing" is a critical field that always requires entry of the requested data because it has no "Unknown" option. Item *4 "Individual's last name or entity's legal name" is a critical field that always requires an entry, either by entering the name when known or

checking the unknown box when the name is not known. Item 7 "Gender" is a non-critical field that requires an entry when the person is an individual because the options are "Male," "Female," or "Unknown." But Item 7 is left blank when the person is an entity because entities do not have a gender and Item 7 would not apply.

*1. Type of filing (check box that applies):

- a. Initial report
- b. Correct/amend prior report
- c. FinCEN directed Back filing
- d. Prior report BSA Identifier

Item *1 Type of filing: Check box 1a "Initial report" if this is the first report filed on the currency transaction(s). FinCEN CTRs filed as a result of a historical or other review of past transactional activity, either directed by a regulating authority other than FinCEN or on the financial institution's own initiative, must always be identified as initial reports. Check box 1b "Correct/amend prior report" if the report corrects or amends a previously-filed FinCEN CTR. See General Instruction 9 for additional instructions on filing corrected or amended CTRs. Check box 1c "FinCEN directed Back filing" if FinCEN directed the financial institution to file the FinCEN CTR on a currency transaction or transactions not previously reported. If box 1b is checked, the prior report's BSA Identifier (BSA ID) must be recorded in field 1d. Enter all zeros if the prior report BSA ID is unknown, for example when the prior report was a paper filing.

Part IV Filing Institution Information

Note: There will be one Part IV for each FinCEN CTR filed.

The filing institution is the entity that files the FinCEN CTR with the BSA E-Filing System. This may be a reporting financial institution or a holding or other parent company filling for its subsidiaries.

Critical fields are denoted by an asterisk (*) in front of the item number, must be completed by providing the data associated with that item. All other items must be completed when data are known but will be left blank when data are unknown or do not apply

* 43. Primary federal regulator

Item 43 Primary federal regulator: Identify the financial institution's primary federal regulator or BSA examiner from the following list. If more than one regulator option could apply, select the regulator that has primary responsibility for enforcing compliance with the BSA. Option "D" for Internal Revenue Service must be entered if the institution is subject to U. S. law and none of the other codes apply. The regulator options are:

- a. *(Check if)* Commodities Futures Trading Commission (CFTC)
- b. *(Check if)* Federal Reserve Board (FRB)
- c. *(Check if)* Federal Deposit Insurance Corporation (FDIC)
- d. *(Check if)* Internal Revenue Service (IRS)
- e. *(Check if)* National Credit Union Administration (NCUA)
- f. *(Check if)* Office of the Comptroller of the Currency (OCC)
- g. *(Check if)* Securities and Exchange Commission (SEC)

* 44 Filing institution legal name

Item 44 Filing institution legal name: Enter only the full legal name of the filing institution as recorded on articles of incorporation or other documents establishing the institution. If an individual's name is recorded, enter the name in (first name) (middle name) (last name) or equivalent format, e.g. John Jacob Doe or Richard R. Roe II, etc. An individual's name might be recorded when, for example, the financial institution is a sole proprietorship.

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

Item 45 Alternate name: If the filing institution recorded in Item 43 has a separate trade name or doing business as (DBA) name, enter that name here. Do not enter a trade or DBA name in Item 43 or a legal name in Item 44. Do not include acronyms such as DBA or AKA with the alternate name.

*46. EIN

Item 46 - EIN: Enter the filing institution's Employer Identification Number (EIN). If the financial institution is a sole proprietorship operating under the sole proprietor's TIN, enter that TIN in Item 45. See General Instruction 12 for information on entering identifying numbers.

*47. Address (number, street, and apt. or suite no.)

*Items *47 - *51. Filing institution address items: Enter the filing institution's home office street address, city, two-letter state abbreviation, ZIP Code, and country abbreviation. See General Instruction 10 for information about the codes to be entered. Provide a suite number if known. A non-location address such as a post office box or rural route number should be used only if the street address information is not available. ZIP Codes must be five or nine digits. See General Instruction 10 for additional instructions on entering addresses. When reporting from a U.S. Territory the entry in Item 49 "State" and Item 51 "Country" will be the same code as listed in ISO 3166-2 for that territory.

*48. City

49. State

*50. ZIP Code

*51. Country

Country can only be "US" or a valid U.S. Territory. If Country is equal to a U.S. territory, enter the same code in Items 49 and 51.

*52. Type of filing institution (Check only one)

- a. *(Check if)* Casino/Card club
- b. *(Check if)* Depository institution
- c. *(Check if)* MSB
- d. *(Check if)* Securities/Futures
- z. *(Check if)* Other *(and specify type in space provided)*

Item *52 Type of filing institution: Check the appropriate option to identify the type of filing institution recorded in Item 44. If option 52z "Other" is selected, enter a brief description of the filing institution type in the associated text field.

53. If 52a is checked, indicate type (Check only one)

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

Item 52 Type of gaming institution: If box 52a "Casino/Card club" is checked, check the appropriate Item 53 box to indicate the type of gaming institution. If box 53z is checked, record a brief description in the associated "Other" text field.

54. Filing institution ID number (for item 44)

- a. Central Registration Depository (CRD) number
- b. Investment Adviser Registration Depository (IARD) number
- c. National Futures Association (NFA) number
- d. Research, Statistics, Supervision, and Discount (RSSD) number
- e. Securities and Exchange Commission (SEC) number
- f. ID number

Item 54 Filing institution ID number: Select the appropriate option from 54a through 54e to record the type of identification number being entered for the filing institution. Enter that number in field 54f "ID number." Leave Item 54 blank if these options do not apply to the filing institution. See General Instruction 12 for information on entering identifying numbers.

* 55. Contact office

Item *55 Contact office: Enter the title of the administrative office that should be contacted to obtain additional information about filed FinCEN CTR's. This office title must be associated with the contact telephone number recorded in Item 56 "Phone number." Do not enter data such as the financial institution legal name or branch names, financial institution addresses, generic names such as "Main Office" or "Home Office," or the names of employees.

*56. Phone number

- a. Ext. (if any)

Item 56 Phone number: Enter the financial institution's contact telephone number that should be called to obtain additional information about FinCEN CTRs. This number must be associated with the administrative office recorded in Item 55 "Contact office." See General Instruction 11 for additional instructions on entering telephone numbers.

Item 56a Ext. (if any): Enter the telephone extension associated with the contact telephone number. Leave Item 54a blank if there is no extension.

*57. Date filed

Item 57 Date filed: Enter the date a batch filed FinCEN CTR is filed in YYYYMMDD format where YYYY = year, MM = month, DD = day. Single digit days or months must be prefaced by a zero. This date will automatically be added to a discrete FinCEN CTR when a filer signs the FinCEN CTR. The date filed in a batch-filed FinCEN CTR must be the date the FinCEN CTR is transmitted to FinCEN's BSA E-Filing System. Any other date would not be the date the FinCEN CTR was filed.

Part III Transaction(s) Location Information

NOTE: If the information entered into Part IV, Filing Institution Information, is the same for Part III check the box and complete Parts I and II. Each FinCEN CTR filed may have up to 999 Part III's.

Prepare a separate Part III section for each transaction location involved in the currency transaction(s). Include the amount transacted at each Part III location in Item 41 "Dollar amount of item 25 Total cash in transacted at this location" and/or Item 42 "Dollar amount of item 27 Total cash out transacted at this location." A transaction location (such as an office or ATM, for example) may be owned or operated by the reporting financial institution required to file the FinCEN CTR or by another financial institution involved in the transaction(s) through a shared branching or other contractual agreement.

Critical fields, denoted by an asterisk (*) in front of the item number, must be completed by providing the data associated with that item. All other items must be completed when data are known but will be left blank when data are unknown or do not apply.

* 29. Primary federal regulator

Item 29 Primary federal regulator: Identify the financial institution's primary federal regulator or BSA examiner from the following list. If more than one regulator option could apply, select the regulator that has primary responsibility for enforcing compliance with the BSA. Option "D" for Internal Revenue Service must be entered if the institution is subject to U. S. law and none of the other codes apply. The regulator options are:

- a. (Check if) Commodities Futures Trading Commission (CFTC)
- b. (Check if) Federal Reserve Board (FRB)
- c. (Check if) Federal Deposit Insurance Corporation (FDIC)
- d. (Check if) Internal Revenue Service (IRS)
- e. (Check if) National Credit Union Administration (NCUA)
- f. (Check if) Office of the Comptroller of the Currency (OCC)
- g. (Check if) Securities and Exchange Commission (SEC)
- z. (Check if) Unknown

* 30. Financial institution legal name

Item 30 Financial institution legal name: Enter only the full legal name of the financial institution as recorded on articles of incorporation or other documents establishing the institution. If an individual's name is recorded, enter the name in (first name) (middle name) (last name) or equivalent format, e.g. John Jacob Doe or Richard R. Roe II, etc. An individual's name might be recorded when, for example, the financial institution is a sole proprietorship.

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

Item 31 Alternate name: If the financial institution recorded in Item 30 has a separate trade name or doing business as (DBA) name, enter that name here. Do not enter a trade or DBA name in Item 30 or a legal name in Item 31. Do not include acronyms such as DBA or AKA with the alternate name.

* 32. EIN

Item 32 - EIN: Enter the financial institution's Employer Identification Number (EIN). If the financial institution is a sole proprietorship operating under the sole

proprietor's TIN, enter that TIN in Item 32. Check the "Unk" Box if the number is unknown (*i.e.*, Shared Branching). See General Instruction 12 for information on entering identifying numbers.

*33. Address (number, street, and apt. or suite no.)

Items *33 - *37. Financial institution address items: Enter the financial institution transaction location's permanent street address, city, two-letter state abbreviation, ZIP Code, and two-letter country abbreviation. See General Instruction 10 for information about the codes to be entered. Provide a suite number if known. A non-location address such as a post office box or rural route number should be used only if the street address information is not available. ZIP Codes must be five or nine digits. See General Instruction 10 for additional instructions on entering addresses. An entry in Item 35 "State" is required with "US" reported in Item 37 "Country" unless the financial institution's address is in a U.S. Territory. When reporting transactions in a U.S. Territory the entry in Item 35 "State" and Item 37 "Country" will be the same code as listed in ISO 3166-2 for the territory.

*34. City

35. State

*36. ZIP Code

*37. Country

Country can only be "US" or a valid U.S. Territory. If Country is equal to a U.S. territory, enter the same code in Items 35 and 37.

*38. Type of financial institution (Check only one)

- a. *(Check if)* Casino/Card club
- b. *(Check if)* Depository institution
- c. *(Check if)* MSB
- d. *(Check if)* Securities/Futures
- z. *(Check if)* Other (*and specify type in space provided*)

Item *38 Type of financial institution: Check the appropriate option to identify the type of financial institution recorded in Item 30. If option 38z "Other" is selected, enter a brief description of the financial institution in the associated text field.

39. If 38a is checked, indicate type (Check only one)

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

Item 38 Type of gaming institution: If box 38a "Casino/Card club" is checked, check the appropriate Item 38a box to indicate the type of gaming institution. If box 38z is checked, record a brief description in the associated "Other" text field.

40. Financial institution ID number (For item 30)

- d. Central Registration Depository (CRD) number

- e. Investment Adviser Registration Depository (IARD) number
- f. National Futures Association (NFA) number
- g. Research, Statistics, Supervision, and Discount (RSSD) number
- h. Securities and Exchange Commission (SEC) number
- i. ID number

Item 40 Financial institution ID number: Select the appropriate option from 40a through 40e to record the type of identification number being entered for the financial institution. Enter that number in field 40f "ID number." Leave Item 40 blank if these options do not apply to the financial institution. See General Instruction 12 for information on entering identifying numbers.

41. Cash in amount for this transaction location \$ _____

Item 41. Cash in amount for this transaction location: Enter the cash in amount transacted at this location. This amount must equal the item 25 total cash in amount if a single transaction at one location is involved. If multiple locations are involved the amount must be less than the Item 25 amount. The multiple Part III Item 41 amounts must equal the Item 25 amount with rounding differences permitted. If no amount is entered in Item 41 then Item 42 "Cash out amount for this location" must have an amount.

42. Cash out amount for this transaction location \$ _____

Item 42. Cash out amount for this transaction location: Enter the cash out amount transacted at this location. This amount must equal the item 27 total cash out amount if a single transaction at one location is involved. If multiple locations are involved the amount must be less than the Item 27 amount. The multiple Part III Item 42 amounts must equal the Item 27 amount with rounding differences permitted. If no amount is entered in Item 42 then Item 41 "Cash in amount for this location" must have an amount.

Part I Person Involved in Transaction

Note: There **may be up to 999 Part I sections in each FinCEN CTR.**

Critical fields, denoted by an asterisk (*) in front of the item number, must be completed by providing the data associated with that item. Critical fields must be completed by the filer, either by providing the requested data or by checking the "Unknown" box when that option is available.

Complete a separate Part I section on each individual or entity involved in the currency transaction(s). Complete each Part I section with as much of the requested information as is known about the individual or entity. Required items, denoted by an asterisk (*) in front of the item number, must be completed by providing the data or by checking the "Unknown" box associated with the item. All other items must be completed when known but will be left blank when the data are unknown or do not apply. There must be at least one Part I in the FinCEN CTR where either box 2a or box 2c was checked.

- *2. a. Person conducting transaction on own behalf
- b. Person conducting transaction for another
- c. Person on whose behalf transaction is conducted

d. Common Carrier

Item 2: Select option 2a if the person recorded in Part I conducted the transaction(s) on his or her own behalf. Option 2a cannot be selected if box 4b, "If entity" is checked. Select option 2b if the person recorded in Part I conducted the transaction(s) on behalf of a different person. Select option 2c if the transaction was conducted by a different person on behalf of the person recorded in Part I. If option 2d is selected because an armored car service under contract with the customer is involved in the transaction(s), the information on the armored car service, not the individual agent of that armored car service, will be recorded in Part I (see FIN-2013-R001). If box 2d is checked to indicate an armored car service under contract with the customer then box 4b must be checked.

NOTE: If more than one Item 2 option applies to a person involved in the transaction(s), complete only one Part I on that person with only one entry in Item 2. Select "Common Carrier" if multiple options that include 2d "Common Carrier" apply. Select 2a "Person conducting transaction on own behalf" if options 2a, 2b, and 2c or options 2a and 2b or options 2a and 2c apply. Select 2b "Person conducting transaction for another" if both 2b and 2c apply.

3. Multiple transactions

Item 3 Multiple transactions: Check box 3 if multiple cash in or cash out transactions of any amount were conducted in a single business day by or for the person recorded in Part I. "Multiple transactions" is not the same as the Item 24 option "Aggregated transactions," which only involves multiple transactions all of which are below the reporting requirements.

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

a. (Check if) Unknown

b. (Check if) If entity

Item *4 Individual's last name or entity's legal name: Enter the individual's last name or the entity's legal name. The entity legal name is the name on the articles of incorporation or other document that established the entity. If an entity is being recorded in Part I, check box 4b "If entity." If box 2d is checked to indicate an armored car service under contract with the customer then box 4b must be checked. If box 2d is checked to indicate any other type of common carrier under contract with the customer, box 4b must not be checked because information on the common carrier employee conducting the transaction must be provided. Do not check box 4 "If entity" if the person involved in the transaction is a sole proprietorship. CTRs involving sole proprietorships will be prepared following FinCEN's most-recently published guidance on reporting currency transactions that involve sole proprietorships. Do not check box 4b if an individual's name is entered in Items 4-6. If the individual's last name or entity's legal name is unknown leave Item 4 blank and check box 4 "Unknown." Do not record also known as (AKA) or doing business as (DBA) names in Item 4. Record these names instead in Item 8 "Alternate name."

*5. First name

a. (Check if) Unknown

Item *5 First name: Enter the individual's first name. If the first name is unknown leave item 5 blank and check box 5 "Unknown." Do not record AKA or DBA names in Item 5. Record these names instead in Item 8 "Alternate name." Leave Item 5 blank if the Part I person is an entity.

6. Middle name and Name suffix

Item 6 Middle name: Enter the individual's middle name or middle initial. Leave this item blank if the middle name or middle initial is unknown or does not apply. Do not record AKA or DBA names in Item 6. Record these names instead in Item 8 "Alternate name."

Item 6a Name suffix: Enter the individual's name suffix such as JR, SR, III, etc. if it is part of the individual's legal name. Leave this item blank if the suffix is unknown or does not apply.

7. Gender

- a. Male
- b. Female
- c. Unknown

Item 7 Gender: Select the option "Male" or "Female" if the individual's gender is known. Select the option "Unknown" if the individual's gender is unknown. Leave this item blank if the person is an entity. Item 7 does not create an obligation for a financial institution to collect this data when such collection would be in conflict with the financial institution's obligations under any other federal law.

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

Item 8 Alternate name: Enter the individual's AKA name or the entity's DBA name if different from the name entered in Items 4-6. Do not include the acronyms AKA or DBA with the name. Do not enter AKA or DBA names in Items 4-6. Do not enter legal names in Item 8.

9. Occupation or type of business

a. NAICS Code

Item 9 Occupation or type of business: Record the occupation, profession, or type of business of the individual or entity recorded in Part I. Use specific descriptions such as doctor, carpenter, attorney, used car dealership, plumber, truck driver, hardware store, etc. Do not use non-descriptive items such as businessman, merchant, retailer, retired, or self-employed. If words like self-employed, unemployed, or retired are used, add the current or former profession if known (e.g. self-employed building contractor, retired teacher, or unemployed carpenter).

Item 9a NAICS Code: Enter the North American Industry Classification System (NAICS) code for the occupation or type of business entered in Item 9. Batch filers should only enter codes from the list of NAICS Codes authorized for use in the FinCEN CTR and located on the BSA E-Filing Web Site (<http://bsaefiling.fincen.treas.gov/main.html>) or from the U.S. Census Bureau NAICS list at <https://www.census.gov/cgi-bin/sssd/naics/naicsrch?chart=2017>. If the Census Bureau list is used filers cannot substitute a sector code (such as 11 Agriculture, Forestry, Fishing and Hunting) for an actual three to six number NAICS Code (such as 11114 Wheat Farming).

*10. Address (number, street, and apt. or suite no.)

- a. (Check if) Unknown

Items *10 - *14 Person's address items: Enter the person's permanent street address, city, state code abbreviation , ZIP Code or foreign postal code, and two letter country code (as listed in ISO 3166-2). Complete any address item that is known, even if the whole address is unknown. If an address item is unknown, leave that item blank and check box "Unknown."

If the person's address is in a U.S. Territory, enter the same code as listed in ISO 3166-2 for that territory in Item 12 "State" and Item 14 "Country code."

See General Instruction 10 for additional information on entering addresses.

* 11. City

a. *(Check if)* Unknown

12. State

a. *(Check if)* Unknown

* 13. ZIP/Postal code

a. *(Check if)* Unknown

* 14. Country code

a. *(Check if)* Unknown

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

a. *(Check if)* Unknown

Item *15 TIN: Enter the person's U.S. or foreign taxpayer identification number (TIN) without formatting or punctuation. If the number is unknown, check box 15 "Unknown" and leave Item 15 blank. See General Instruction 12 for information on entering identifying numbers.

16. TIN type

a. EIN

b. SSN-ITIN

c. Foreign

Item 16 TIN type: Identify the type of TIN recorded in Item 15. Select option "EIN" if the person has a U.S. Employer Identification Number (EIN). Select option "SSN-ITIN" if the person has a U.S. Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN). Select option "Foreign" if the person has a foreign TIN of any type. Box 4b also must be checked if the foreign person is an entity. Record a TIN type only if a TIN is entered in Item 15. If a 9-digit TIN is entered in Item 15 but the TIN type is unknown, select "EIN" if the person is an entity and "SSN-ITIN" if the person is an individual. TINs that are not 9 digits are presumed to be foreign, so option "Foreign" would be selected.

* 17. Date of birth

a. *(Check if)* Unknown

Item *17 Date of birth: Enter the individual's date of birth in Item 17. Batch filers will use the format YYYYMMDD format where YYYY = year, MM = month, DD = day. The format YYYY/MM/DD must be used in Item 17 on the BSA E-Filing discrete. Any single digit month or day must be preceded by a zero. If the birth day and or month is unknown, enter "00" for the unknown day or month. For example, a date of birth with an unknown day in February 1978 would be entered as 02001978. Do not

enter zeros for the year if the year is unknown. If the year of birth or the entire date of birth is unknown, check box 17 "Unknown" and leave Item 17 blank. If box 4 "If entity" is checked, Item 17 and box 17 "Unknown" must be blank.

18. Contact phone number (if available) 18a. Ext. (if any)

Item 18 Contact phone number: Enter the person's U.S. or foreign contact telephone number with no formatting such as parentheses, spaces, or hyphens. If the telephone number is unknown, leave item 18 blank. See General Instruction 11 for instructions on entering telephone numbers.

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

19. E-mail address (if available)

Item 19 E-mail address: Enter the person's e-mail address if known. Include all formatting, punctuation, and special characters in the e-mail address. An e-mail address must contain the "@" sign with a period in the following text, e.g. johndoe@business.com or richardroephd@college.edu. Leave Item 19 blank if the e-mail address is unknown.

*20. Form of identification used to verify identity:

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

Item *20 Form of identification: Enter in Item 20 the information used to identify the individual or entity recorded in Item 4. Check box 20b if the identification was a driver's license or state ID, box 20c if the identification was a passport or box 20d if the identification was an alien registration. Check box 20z if a different identification was provided and describe that identification in the "Other" text field. "Other" identification could include such things as an entity's business license or incorporation documents, corporate ID cards, local government ID cards, etc. Enter the identification number in field 20g "Number." Do not include formatting such as spaces, hyphens, or periods in the number. Enter the appropriate two or three-letter abbreviation or code in field 20e "Issuing State" if the identification issuer was a U.S. state or the District of Columbia, a Mexican state, or a Canadian province or territory. If the identification was issued by or in a U.S. Territory the two-letter territory code will be entered in Field 20e "Issuing state" and 20f "Country." See General Instruction 10 for information about the codes to be entered. If the identification issuer does not have a code in this document, enter the two letter code for the issuer's country in field 20f. For example, if the issuer was the London Police Department the code "GB" for United Kingdom would be entered in 20f. Enter all identification data that is available. Check box 20a "Unknown" only if the individual or entity is known and all identification information is unknown. See General Instruction 12 for further information on entering identifying numbers.

21. Cash in amount for individual or entity listed in item 4

- a. Acct. number(s) included in item 21

Item 21 Cash in amount: Enter the total cash in amount denominated in U.S. Dollars that was transacted by or for the person recorded in Item 4. This amount cannot be greater than the amount in Item 25 "Total cash in." Record the account numbers of all accounts involved in the transaction(s) made by or for the person recorded in Item 4. If no amount is recorded in Item 21 then Item 22 "Cash out" amount for this individual must contain an amount. See General Instructions 12 and 13 for additional instructions on entering account numbers and amounts.

22. Cash out amount for individual or entity listed in item 4

- a. Acct. number(s) included in item 22

Item 22 Cash out amount: Enter the total cash out amount denominated in U.S. Dollars that was transacted by or for the person recorded in Item 4. This amount cannot be greater than the amount in Item 27 "Total cash out." Record the account numbers of all accounts involved in the transaction(s) made by or for the person recorded in Item 4. If no amount is recorded in Item 22 then Item 21 "Cash in" amount for this individual must contain an amount. See General Instructions 12 and 13 for additional instructions on entering account numbers and amounts.

Part II Amount and Type of Transaction(s)

Note: There will be one Part II for each FinCEN CTR filed.

Critical fields, denoted by an asterisk (*) in front of the item number, must be completed by providing the data associated with that item. Critical fields must be completed by the filer, either by providing the requested data or by checking the "Unknown" box when that option is available.

Complete the Part II section by recording all details concerning the currency transaction. Such details include transaction date, types of transactions, transaction amounts including total cash in and/or total cash out, and information about any foreign currencies involved in the transactions. All items must be completed when known but will be left blank when data are unknown or do not apply

* 23. Date of transaction

Item *23 Date of transaction: Enter the date of the transaction(s) in Item 23. Batch filers will use the format YYYY/MM/DD format where YYYY = year, MM = month, DD = day. The format YYYY/MM/DD must be used in Item 23 on the BSA E-Filing discrete FinCEN CTR. Any single digit month or day must be preceded by a zero.

24 a. (Check if) Armored car (FI contract)

b. (Check if) ATM (See definitions)

c. (Check if) Mail Deposit or Shipment

d. (Check if) Night Deposit

e. (Check if) Aggregated transactions

f. (Check if) Shared Branching (See definitions)

Item 24: Indicate whether any of the following delivery/payment methods were involved in any part of the transaction(s). Check all that apply. Check box 24a "Armored Car" if a reported transaction involved a pick-up or delivery of currency by an armored car service under contract to the financial institution listed in Part III or the filing institution listed in Part IV. Do not check box 24a if the armored car service was under contract to a person recorded in Part I. Check box 24b "ATM" if a reported transaction occurred at an automated teller machine (ATM). Check box 24c "Mail Deposit or Shipment" if a reported transaction was made by mail deposit or shipment. Check box 24d "Night Deposit" if a reported transaction involved a night deposit of cash. Check box 24e "Aggregated transactions" if the financial

institution did not identify any transaction(s) because the FinCEN CTR reports aggregated transactions all below the reporting requirement with at least one transaction a teller transaction. The option "Aggregated transactions" is not the same as Item 3 "Multiple transactions," which can involve transactions that are above the reporting requirement where a transactor is known and may involve transactions none of which were teller transactions. Check box 24f "Shared branching" if the transaction was conducted on behalf of another financial institution that is a member of a co-operative network (this option applies only to credit unions that are members of a cooperative).

*25. Total cash in

- a. Deposit(s)
- b. Payment(s)
- c. Currency received for funds transfer(s) out
- d. Purchase of negotiable instrument(s)
- e. Currency exchange(s)
- f. Currency to prepaid access
- g. Purchase(s) of casino chips, tokens, and other gaming instruments
- h. Currency wager(s) including money plays
- i. Bills inserted into gaming devices
- z. Other (specify)

Item *25 Total cash in: Record the total cash in amount involved in the transaction(s) if that amount is greater than \$10,000. Record the total amount on the "Total cash in" line and total or subtotals on whichever of line 25a through 25i best describe the transaction or aggregated transactions. If any portion of the total amount is not described by any of those options, record that portion on line 25z and provide a brief description of the transaction(s) in the "Other" text field. If the total amount of the cash in transaction or aggregated transactions is \$10,000 or less, do not record any amounts in Item 25. The total of the amounts recorded in fields 25a through 25z must equal the amount recorded in the Item 25 "Total cash in" field. The total cash in will be automatically computed in BSA E-Filing discrete FinCEN CTR from the entries in 25a through 25i and 25z. See General Instruction 14 for instructions on determining whether transactions are reportable on a FinCEN CTR.

26. Foreign cash in

- a. Foreign country (two letter code)

Item 26 Foreign cash in: If the cash in transaction(s) involved a foreign currency or currencies, enter the total amount of each foreign currency in Item 26 and the two letter code for the country that issued the currency in Item 26a. Complete an Item 26 and 26a for each foreign currency involved. Do not convert amounts to U.S. Dollars. Round fractional amounts up to the next whole amount. For example, 21,527.25 Euros would be recorded as 21,528. See General Instruction 10 for information about the codes to be entered.

*27. Total cash out

- a. Withdrawal(s)
- b. Advance(s) on credit (including markers)
- c. Currency paid from funds transfer(s) in
- d. Negotiable instrument(s) cashed
- e. Currency exchange(s)
- f. Currency from prepaid access

- g. Redemption(s) of casino chips, tokens, TITO tickets, and other gaming instruments
 - h. Payment(s) on wager(s) (including race book and OTB or sports pool)
 - i. Travel and complimentary expenses and gaming incentives
 - j. Payment for tournament, contest or other promotions
-

z. Other (specify)

Item *27 Total cash out: Record the total cash out amount involved in the transaction or aggregated transactions if that amount is greater than \$10,000. Record the total amount on the "Total cash out" line and total or subtotals on whichever of line 27a through 27j best describe the transaction or aggregated transactions. If any portion of the total amount is not described by any of those options, record that portion on line 27z and provide a brief description of the transaction in the "Other" text field. If the total amount of the cash out transaction or aggregated transactions is \$10,000 or less, do not record any amounts in Item 27. The total of the amounts recorded in fields 27a through 27z must equal the amount recorded in the Item 27 "Total cash out" field. The total cash out will be automatically computed in BSA E-Filing discrete FinCEN CTR from the entries in 27a through 27j and 27z. See General Instruction 14 for instructions on determining whether transactions are reportable on a FinCEN CTR.

NOTE: In the casino industry "TITO" refers to ticket in/ticket out and "OTB" refers to off-track betting.

28. Foreign cash out

a. Foreign country (two letter code)

Item 28 Foreign cash out: If the cash out transaction(s) involved a foreign currency or currencies, enter the total amount of each foreign currency in Item 28 and the two letter code for the country that issued the currency in Item 28a. Complete an Item 28 and 28a for each foreign currency involved. Do not convert amounts to U.S. Dollars. Round fractional amounts up to the next whole amount. For example, 21,527.25 Euros would be recorded as 21,528. See General Instruction 10 for information about the codes to be entered.