

BSA Referral Form

Initial Report

Continued Activity - Last Report Date: _____

PART I

Suspect(s) Information

Name: _____ Work Phone: _____

Address: _____ Home Phone: _____

SSN or EIN: _____ Date of Birth: _____

Passport #: _____ DL State & #: _____

PART 2

Account Information

Account Owner?

Yes No If No, Explain: _____

Account Number(s):

1: _____ 2: _____

3: _____ 4: _____

PART 3

Transaction Information

Date: _____ Amount: _____

Description: _____

CTR Filed? Yes No Date: _____

Date: _____ Amount: _____

Description: _____

CTR Filed? Yes No Date: _____

Date: _____ Amount: _____

Description: _____

CTR Filed? Yes No Date: _____

PART 4

Suspicious Activity Discussion

Fill out any useful information regarding the transactions or incident when checking "Other".

Structuring

- Alters or cancels transaction to avoid BSA recordkeeping requirement
- Alters or cancels transaction to avoid CTR requirement
- Suspicious inquiry by customer regarding BSA reporting or recordkeeping requirements
- Transaction(s) below BSA recordkeeping threshold
- Transaction(s) below CTR threshold
- Other (specify type of suspicious activity in space provided): _____

Terrorist Financing

- Known or suspected terrorist / terrorist organization
- Other (specify type of suspicious activity in space provided): _____

Fraud

- ACH
- Advance fee
- Business loan
- Check
- Consumer Loan
- Credit / Debit Card
- Healthcare/Public or private health insurance
- Mail
- Mass-marketing
- Ponzi scheme
- Pyramid scheme
- Wire

Gaming

- Chip walking
- Minimal gaming with large transactions
- Suspicious use of counter checks or markers
- Unknown source of chips

Gaming (cont)

- Other (specify type of suspicious activity in space provided) _____

Money Laundering

- Exchanges small bills for large bills or vice versa
- Funnel Account
- Suspicion concerning the physical condition of funds
- Suspicion concerning the source of funds
- Suspicious designation of beneficiaries, assignees or joint owners
- Suspicious EFT/ Wire transfers
- Suspicious exchange of currencies
- Suspicious receipt of government payments or benefits
- Suspicious use of multiple accounts
- Suspicious use of noncash monetary instruments
- Suspicious use of third-party transactors (straw-man)
- Trade Based Money Laundering / Black Market Peso Exchange
- Transaction out of pattern for customer (s)
- Other (specify type of suspicious activity in space provided): _____

Identification / Documentation

- Changes spelling or arrangement of name
- Multiple individuals with same or similar identities
- Provided questionable or false documentation
- Refused or avoided request for documentation
- Single individual with multiple identities
- Other (specify type of suspicious activity in space provided): _____

PART 4

Suspicious Activity Discussion (cont)

Fill out any useful information regarding the transactions or incident when checking "Other".

Other Suspicious Activities

- Account takeover
 - Bribery or gratuity
 - Counterfeit instruments
 - Elder financial exploitation
 - Embezzlement, theft or disappearance of funds
 - Forgeries
 - Human smuggling
 - Human trafficking
 - Identity theft
 - Little or no concern for product performance penalties, fees, or tax consequences
 - Misuse of position or self-dealing
 - Suspected public/ private corruption (domestic)
 - Suspected public/ private corruption (foreign)
 - Suspicious use of informal value transfer system
 - Suspicious use of multiple transaction locations
 - Transaction with no apparent economic, business, or lawful purpose
 - Transaction(s) involving foreign high risk jurisdiction
 - Two or more individuals working together
 - Unlicensed or unregistered MSB
 - Other (specify type of suspicious activity in space provided): _____
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Insurance

- Excessive insurance
- Excessive or unusual cash borrowing against policy/annuity
- Proceeds sent to or received from unrelated third party
- Suspicious life settlement sales insurance (e.g. STOLIs, Viaticals)
- Suspicious termination of policy or contract

Insurance (cont)

- Unclear or no insurable interest
 - Other (specify type of suspicious activity in space provided): _____
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Securities / Futures / Options

- Insider trading
 - Market manipulation
 - Misappropriation
 - Unauthorized pooling
 - Wash Trading
 - Other (specify type of suspicious activity in space provided): _____
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Mortgage Fraud

- Application fraud
 - Appraisal fraud
 - Foreclosure/Short sale fraud
 - Loan modification fraud
 - Origination Fraud
 - Other (specify type of suspicious activity in space provided): _____
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Cyber event (If reporting)

- Against Financial Institution(s)
 - Against Financial Institution Customer(s)
 - Other (specify type of suspicious activity in space provided): _____
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Were any of the following product type(s) involved in the suspicious activity? Check all that apply

- Bonds / Notes
 - Commercial mortgage
 - Commercial paper
 - Credit card
 - Debit Card
 - Deposit account
 - Forex transactions
 - Futures/Options on futures
 - Hedge fund
 - Home equity line of credit
 - Home equity loan
 - Insurance/Annuity products
 - Microcap securities
 - Mutual fund
 - Options on securities
 - Prepaid access
 - Residential mortgage
 - Security futures products
 - Stocks
 - Swap, hybrid or other derivative
 - Other: _____
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Were any of the following instrument type(s)/payment mechanism(s) involved in the suspicious activity? Check all that apply

- Bank / cashier's check
 - Foreign currency
 - Funds transfer
 - Gaming instruments
 - Government payment
 - Money orders
 - Personal/Business check
 - Travelers checks
 - U.S. Currency
 - Other: _____
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Other Commentary

PART 5**Preparer Information**

Name: _____

Work Phone: _____ Date: _____

Print Name: _____ Signature: _____

PART 6**Reviewer Information**

Name: _____

Work Phone: _____ Date: _____

SAR Filed? Yes No Date: _____

Print Name: _____ Signature: _____

Note: documentation or additional information may be attached to the submission to the BSA Officer.