

CTR (Cash Transaction Report) Forms Automation and Integration with CU*BASE BSA Tools

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Systems Affected:

- CU*BASE

This project makes changes to the teller system to replace the existing teller warning that a transaction triggers for a Currency Transaction Report (CTR) to be completed. Instead, the system will actually display a series of CTR form fill-in screens, with as many fields as possible pre-populated from the transaction and CU*BASE files. All data used to compile the form will be stored so that the CTR can be printed immediately or later (90-day retention), and it can be reviewed, edited, reprinted, and ultimately marked as “submitted” via the BSA Inquiry tool.

This optional new feature will be controlled by a new flag in BSA Configuration so a CU can choose whether to use online forms or retain the simple warning message they see now.

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Project Overview

Currently, during a teller transaction, the system checks the teller audit file to determine if the member has certain types of transactions that total more than \$10,000 (or other amount) as set in the credit union's BSA configuration. If the total transaction meets the configured minimum, a warning message is delivered to the teller stating that a CTR must be filed. This project is designed to replace that warning message with the actual CTR form.

1423-Warning: Verify against bank secrecy act rules

The Process

The process flow in a credit union for CTRs is once the CTR is filled out by the teller it then goes to a second individual, many times the BSA Officer, who then reviews the form for accuracy, in some cases updates the form, and then submits the form to the government.

Now when CU*BASE Teller Processing sees that a CTR form needs to be filled out, the teller will have the choice of completing it immediately as part of posting the transaction, or saving a partial form to be completed later at a more convenient time. In either case an **Audit Tracker** conversation note will be generated.

At the end of each day, when BSA monitoring is done, the system will gather any CTR forms created that day (whether completed fully and printed, or not) and combine them with the day's BSA data, ready for the next stage in the process.

The next day, a designated user would then use the CU*BASE BSA Inquiry tool to review forms already printed, edit forms as needed, and print or reprint forms that were saved. The user would also be able to create new CTRs for records as needed, such as when individual transaction amounts did not warrant a CTR but the combined total of multiple transactions causes the CTR flag to be triggered at the end of the day.

Finally, the BSA auditor or other designated employee would finish printing all required CTRs and the final step would be to flag each record as "submitted"

A Note about "Submitting" CTR Forms to the Government

In a future phase the "submit" feature could in fact submit the form electronically to an appropriate government website. We already have specs for how this could potentially be done, but that project will be evaluated separately once this initial phase is in place.

CTR Form

The form would be generated through a similar process as we do custom loan forms, but with a new database similar to the CU*BASE Mortgage Forms Data Capture system so that the data entered will be retained for additional review, edits, and reprints.

We will have John Wood digitize the form and have screens built for input by the user or data gathered from CU*BASE. The form can be created and printed from both the teller line and from the CU*BASE BSA Inquiry tool.

☛ NOTE: A copy of the Currency Transaction Report (see Page 24) has been sent to John Wood to create an electronic version of the form. This form does change on occasion and there will be a need to keep this form up to date. This will be handled by the Audit Link team.

Printing

Printing would be to a CU*BASE device similar to how loan forms and other CU*BASE forms currently work.

- ☞ FYI, on the printed form (in MS Word format), other than headings the font used is **7 point Arial expanded by .2 pt.**

Database

Page 6 shows the list of the fields required to populate the form. The form includes data from other CU*BASE files (such as MASTER) as well as from a new database of miscellaneous CTR-related data.

Data Retention

In this first phase CTR forms will not be archived via CU*SPY nor burned to CD. However, the CTR database files will have a **90-day day retention period*** so that there is a period of time where the form can be reviewed and reprinted before it is purged from the CU*BASE database.

**BSA data is also currently retained for a rolling 90 days, purged once a month.*

The retention of CTR forms is set by regulation at five years. Therefore, it will be up to the CU to retain the final paperwork for the required 5 years.

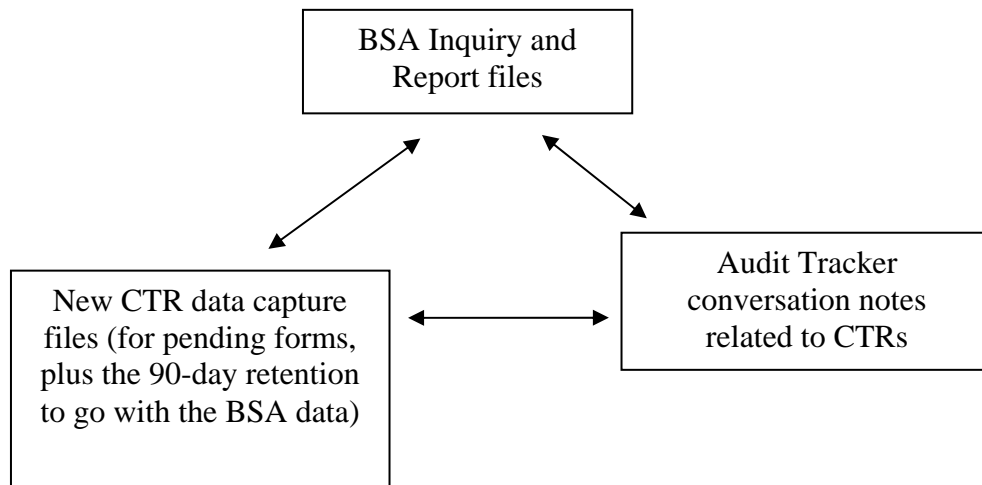
Electronic Archival

As mentioned above, in this first phase CTRs will NOT be archived electronically or included in the standard CU*SPY (CU*Answers private ASP) electronic documents strategy.

However, if a CU has an in-house e-documents server (eDOC or other) they are free to treat this like any other custom form they produce and archive it as appropriate (i.e., send the output to their designated eDOC printer after setting up custom indexes, just as they would with any other custom form).

File Specifications

Connecting the Dots: File structure may need to allow for linkages between three main databases:



Originally we wanted to actually link them together so you could jump to a CTR from a Tracker or from BSA or whatever, but I think as long as we have some sort of data element that shows which goes with which, the user can just find the one they want manually. Ideas for accomplishing this:

- Assign a system-generated sequential **CTR #**
- Use the Tracker # and other Tracker header info ?

I'll leave this up to the programmer to work through some of these fine points, and we can also have software review sessions with Jim or Leah from Audit Link to help decide what will "links" might be helpful to be able to do, even if we can't do it all in this first pass.

New CTR Data Capture File

Need a new file to retain the data captured for filling in the CTR, similar to the Mortgage Data Capture system. Will need to be retained longer (current plan is 90 days to match BSA), and unlike the mortgage data capture will need to be able to store multiple records at the same time, by **member** and **date**.

☛ Still max of one CTR form per member per day, according to Jim Vilker. (If the member does several transactions, they combine everything into a single form for that date.)

The important nuance to understand here is that there will be CTRs that get started during the day, then at night when BSA monitoring is done, additional CTRs may be needed for any where the aggregate of multiple transactions warrants a CTR but there wasn't a prompt during the day.

SHARED BRANCHING: Are CUs are responsible for filling out CTRs even if the member they waited on was a shared branch member of another CU? **PER LEAH, YES** If so, the file will need to be able to record shared branch member data as part of the form itself. Will the member CU then need to be able to get to that report later? **DON'T THINK SO See Page 12 for more details.**

ALSO, LEAH AND BOB COLBURN DISCOVERED SOME GLITCHES IN HOW THIS CURRENTLY WORKS AND A SEPARATE PROJECT SHEET IS UNDERWAY – PLEASE COORDINATE

Note to programmer: the following decisions must be considered for all new files created with this project:

| | |
|---|--|
| File name (use standard naming convention) | |
| Description - how will the file be used? | |
| Special file specifications | |
| EOM file required? | |
| Purge criteria to ensure the file is kept clean: Does the file need a daily and/or monthly purge? Can records be purged when the account/membership closes or other activity is done? | |
| Does this file obsolete any other files? | |
| Sign-off by Jack C and Jody K | |

Changes to MASTER/MSTRL

- Need to add a 1-byte “Exempt from CTR” field to a master or trailer file, so the CU can flag an account as not requiring a CTR ever to be filled in (apparently there are exceptions and once they file the proper paperwork, they don’t have to do CTRs for that account ever again)

This is not a deal-breaker for this project but if we have any filler we can use in the file it would be nice to get this part done at the same time.

Changes to the BSA Files

- May need a change to the BSA file(s) to tie everything together (CTR #, etc.) – see Page 4

Conversion Notes

- New Audit Tracker Memo Type(s) – see Page 13
- Maybe flood BSA configurations – i.e., if Teller alert flag = Y, make A, etc. – see Page 10

New Database Fields for Filling in the Form

Field lengths should be the same as similar fields in MASTER or other CU*BASE files, and the programmer should use judgment as to field lengths for other fields based on the physical layout of the form or other limitations. Contact Jim Vilker if questions on a particular data element.

| <i>Field</i> | <i>Location in CU*BASE Database (if applicable) or "Input" if new field needed</i> |
|--------------|--|
|--------------|--|

Page 1

Check all boxes that apply:

- | | |
|--------------------------|--|
| 1a Amends Prior report | Input (place an X if clicked) |
| 1b Multiple persons | Input (place an X if clicked) and also display multiple person section+B65 |
| 1c Multiple transactions | Input (place an X if clicked) |

Part 1: Person(s) Involved in Transaction(s)

Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted

- | | |
|---|--------|
| 2 Individual's last name or entity's name | Master |
| 3 First name | Master |
| 4 Middle initial | Master |
| 5 Doing business as (DBA) | Master |
| 6 SSN or EIN | Master |
| 7 Address | Master |
| 8 Date of birth | Master |
| 9 City | Master |
| 10 State | Master |
| 11 ZIP code | Master |
| 12 Country code (if not in US) | Input |
| 13 Occupation, profession, or business | Input |

If an individual, describe method use to verify identity:

- | | |
|-------------------------------|---|
| 14a Driver's license/State ID | Input (place an X if clicked) |
| 14b Passport | Input (place an X if clicked) |
| 14c Alien registration | Input (place an X if clicked) |
| 14d Other | Input (allow up to maximum the field will hold) |
| 14e Issued by: | Input (allow up to maximum the field will hold) |
| 14f Number: | Input (allow up to maximum the field will hold) |

Section B - Individual(s) Conducting Transaction(s) (if other than above)

- | | |
|---|-------------------------------|
| a Armored Car Service | Input (place an X if clicked) |
| b Mail Deposit or Shipment | Input (place an X if clicked) |
| c Night Deposit or Automated Teller Machine | Input (place an X if clicked) |

| | |
|---|---|
| d Multiple Transactions | Input (place an X if clicked) |
| e Conducted On Own Behalf | Input (place an X if clicked) |
| 15 Individual's last name | Input (allow up to maximum the field will hold) |
| 16 First name | Input (allow up to maximum the field will hold) |
| 17 Middle initial | Input (1 character) |
| 18 Address (number, street, and apt or suite no.) | Input (allow up to maximum the field will hold) |
| 19 SSN | Input (9 character) |
| 20 City | Input (allow up to maximum the field will hold) |
| 21 State | Input (2 character) |
| 22 ZIP Code | Input (9 character) |
| 23 Country code (if not US) | Input (2 character) |
| 24 Date of birth | Input (MM/DD/YYYY) |

If an individual, describe method used to verify identity:

| | |
|-------------------------------|---|
| 25a Driver's license/State ID | Input (place an X if clicked) |
| 25b Passport | Input (place an X if clicked) |
| 25c Alien registration | Input (place an X if clicked) |
| 25d Other | Input (place an X if clicked) |
| 25e Issued by: | Input (allow up to maximum the field will hold) |
| 25f Number: | Input (allow up to maximum the field will hold) |

**Part 2: Amount and Type of Transaction(s)
Check all boxes that apply.**

| | |
|---|--|
| 26 Total cash in \$ | Bring in from teller audit file or new file jack is creating |
| 26a Foreign cash in | No way to know this so they would need to input it |
| 27 Total cash out \$ | Bring in from teller audit or new file jack is creating |
| 27a Foreign cash out | No way to know this so they would need to input it |
| 28 Date of transaction | Today's date (mm/dd/yyyy) |
| 29 Foreign country (check box) | Input (place an X if clicked) |
| 29 Foreign Country | Input (allow up to maximum the field will hold) |
| 30 Wire Transfer(s) | Input (place an X if clicked) |
| 31 Negotiable Instrument(s) purchased | Input (place an X if clicked) |
| 32 Negotiable Instrument(s) Cashed | Input (place an X if clicked) |
| 33 Currency Exchange(s) | Input (place an X if clicked) |
| 34 Deposit(s)/Withdrawal(s) | Input (place an X if clicked) |
| 35 Account Number(s) Affected (if any): | Input (allow as many as will fit into the three available lines) |
| 36 Other (specify) | Input (allow as many as will fit into the three available lines) |

**Part 3: Financial Institution Where
Transaction(s) Takes Place**

| | |
|--|---|
| 37 Name of financial institution | Bring in from CMASTER/CUBASEFILE |
| 38 Address (number, street, and apt. or suite no.) | Bring in from CMBRANCH/CUBASEFILE branch = 01 |

| | |
|--|---|
| 39 EIN or SSN | Bring in from CMASTER/CUBASEFILE |
| 40 City | Bring in from CMBRANCH/CUBASEFILE branch = 01 |
| 41 State | Bring in from CMBRANCH/CUBASEFILE branch = 01 |
| 42 ZIP code | Bring in from CMBRANCH/CUBASEFILE branch = 01 |
| 43 Routing (MICR) number | Bring in from General ledger file |
| 44 Title of approving official | No data element |
| 45 Signature of approving official | No data element |
| 46 Date of signature | Today's date (mm/dd/yyyy) |
| 47 Type or print preparer's name | No data element |
| 48 Type or print name of person to contact | No data element |
| 49 Telephone number | No data element |

Multiple Persons (Page 2)

- Only display this section if box 1b is checked
- **The following fields are actually repeated** (top and bottom of the form) so that up to 2 names can be entered.

Part 1: Person(s) involved in Transaction(s)

Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted

| | |
|---|-------|
| 2 Individual's last name or entity's name | Input |
| 3 First name | Input |
| 4 Middle initial | Input |
| 5 Doing business as (DBA) | Input |
| 6 SSN or EIN | Input |
| 7 Address | Input |
| 8 Date of birth | Input |
| 9 City | Input |
| 10 State | Input |
| 11 ZIP code | Input |
| 12 Country code (if not in US) | Input |
| 13 Occupation, profession, or business | Input |

If an individual, describe method use to verify identity:

| | |
|-------------------------------|---|
| 14a Driver's license/State ID | Input (place an X if clicked) |
| 14b Passport | Input (place an X if clicked) |
| 14c Alien registration | Input (place an X if clicked) |
| 14d Other | Input (allow up to maximum the field will hold) |
| 14e Issued by: | Input (allow up to maximum the field will hold) |
| 14f Number: | Input (allow up to maximum the field will hold) |

Section B--Individual(s) Conducting Transaction(s) (if other than above)

| | |
|--|---|
| 15 Individual's last name | Input (allow up to maximum the field will hold) |
| 16 First name | Input (allow up to maximum the field will hold) |
| 17 Middle initial | Input (1 character) |
| 18 Address (number, street, and apt or suite no.) | Input (allow up to maximum the field will hold) |
| 19 SSN | Input (9 character) |
| 20 City | Input (allow up to maximum the field will hold) |
| 21 State | Input (2 character) |
| 22 ZIP Code | Input (9 character) |
| 23 Country code (if not US) | Input (2 character) |
| 24 Date of birth | Input (MM/DD/YYYY) |
| If an individual, describe method used to verify identity: | |
| 25a Driver's license/State ID | Input (place an X if clicked) |
| 25b Passport | Input (place an X if clicked) |
| 25c Alien registration | Input (place an X if clicked) |
| 25d Other | Input (place an X if clicked) |
| 25e Issued by: | Input (allow up to maximum the field will hold) |
| 25f Number: | Input (allow up to maximum the field will hold) |

Changes to BSA Configuration

Access: MNCNFC #14 Bank Secrecy Act Monitoring Cfg
 Program: UBKSCFG
 GOLD panel: 1694

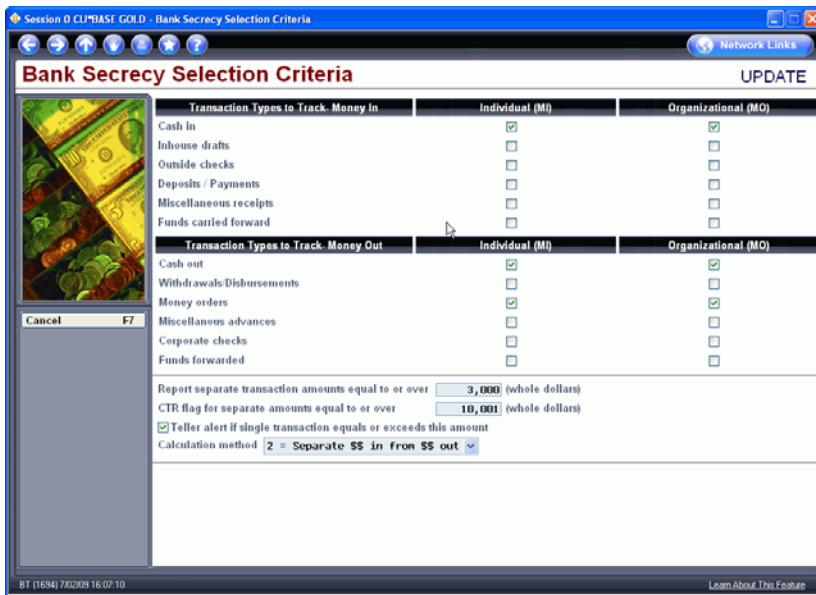
```
*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8

7/02/09          Bank Secrecy Selection Criteria          16:07:10
                  UPDATE                                UBKSCFG-01
TRAN TYPES TO TRACK - $$ IN      INDIVIDUAL (MI)      ORGANIZATIONAL (MO)
Cash In                          Y                      Y
Inhouse Drafts                   N                      N
Outside Checks                   N                      N
Deposits/Payments                N                      N
Misc. Receipts                   N                      N
Funds Carried Forward            N                      N
TRAN TYPES TO TRACK - $$ OUT
Cash Out                          Y                      Y
Withdrawals/Disbursements        N                      N
Money Orders                     Y                      Y
Misc. Advances                   N                      N
Corporate Checks                 N                      N
Funds Forwarded                  N                      N
Report separate trans amounts Equal to or over 0003000 (whole dollars)
CTR flag for separate amounts Equal to or over 0010001 (whole dollars)
Teller alert if single trans Equals or exceeds this amount A (A, N, F)
Calculation Method 2
(1=Combine $$ in and $$ out; 2=Separate $$ in from $$ out)

Cmd/7-Cancel
```

Change the *Teller alert...* flag on line 19 as shown - instead of Y/N, make this have 3 options:

- A = Alert message only (formerly Y)
- N = No alert (same as N now)
- F = Prompt to fill in CTR Form



Changes to Member Information Update

Access: MNUPDT #1 Update Membership Info (or MNSERV #13)
 Program: UMBRSL3CL
 GOLD panel: 2431

```

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8

8/03/09 Update Membership-Individual 13:15:55
UMBRSHIP-23
Branch No. 01 FRANKENMUTH C U - MAIN OFFICE Mbrship 1075
Designation Individual Date Opened 5181979
Name JOHN Q MEMBER SSN 372-40-0320

OTHER INFORMATION
Reason 04 ? User-Defined Fields 0 0 ? Stmt Group (0-9) 0 ? Acct Exec ?
Employee Type 0 ? Employee No. Department/Sponsor # ?
Proxy Ballots (Y/N) N Divd Withholding (Y/N) N Excl. from Dormancy (Y/N) N
Check Hold Status 1 ? Certification of SSN C ? Electronic Dep Hld Grp 01 ?
Allow shared branch trans (Y/N) Y 3rd-Party Opt Out N CU Contact Opt Out N
Preferred contact method NP ? No Preference Selected
Reference Marital Status (M/S/U) Tran Source ID
Due Diligence monitoring level (0-9) 0 Exempt from CTR N
Mother's Maiden Name MEMBER Code Word
Force Monthly Statement (Reg E Override) 0
Email Address

Email address is wrong N

Cmd/3-Backup Cmd/7-CANCEL Cmd/8-Bypass Cmd/9-Alt Address Cmd/10-Greeting
  
```

- Add *Exempt from CTR* and default to N (not sure where to put this, since this screen gets changed in practically every project I spec these days, but maybe there's room on line 15 after the Due Diligence field?)



Changes to Teller Posting

Access: MNSERV #1 Teller Line Posting

- No actual changes to the Teller screens themselves, but if BSA config is set to prompt for a CTR Form, the existing warning message that appears when the credit union's BSA rules cause the CTR warning (shown below) to appear, should be changed so that instead, it automatically pops the new series of data capture screens (see Page 22) for filling out the CTR. The final screen allows the user to print and save, or just save and complete the transaction posting routine.

1423-Warning: Verify against bank secrecy act rules

Per our doc, this warning runs on the following teller screens:

- Teller Main - TSBMTB-04 / GOLD panel 3104
 - Teller Misc. Receipts - TSBRTB-01 / GOLD panel 1560
 - Teller Misc. Advances - TSBATB-01 / GOLD panel 1533
 - Teller CU Checks or Money Orders - TSBCTB-01 / GOLD panel 1536
-
- If the new *Exempt from CTR* flag is Y for that account, then do NOT pop the alert or the CTR screens
 - If a CTR has already been started for that SSN/TIN for that same date, then just pop that same one up again (don't start a new one for that same date)
 - F10-Save/Done on any of the screens saves and automatically creates a note (memo type CT) in the member's Audit Tracker (skip that step for non-members) using the standard text as defined on Page 13. Don't need to display any tracker screens for the user, though; just do it all behind the scenes.
 - F20-Override/Cancel on the initial screen presents a warning and forces an Audit Tracker note (memo type CO) with generic text (see Page 13), also prompting the user for additional text

Not sure about the flow when it comes to subsequent teller transactions (Proc Codes, the new mortgage payment pop-up windows, etc.) Might need to talk about this in a review session once the programmer has a chance to look at options.

Special Note re Shared Branching

- When a teller performing a shared branch transaction sees the CTR warning, want to do a simple automated Tracker stating that a Shared Branch teller was prompted to complete a CTR, with emp ID 99 and Shared Brand ID xx (where xx is the CUID of the shared branch)

I'm still a little fuzzy on this part – apparently there are problems right now with Trackers being created during shared branch activity and going off into never-never land. I need some help here.

Audit Tracker

See Pages 12 and 17 for more info about the flow when various Tracker notes would be created.

Generic Text for Conversation Notes

Generic text to be used for Tracker conversations when various events occur (all should include employee ID, date and time, etc.).

| <i>Event</i> | <i>Text</i> | <i>Other Details to include</i> |
|---|---------------------------------|---|
| When CTR is saved at any point (every time it gets edited, whether the first time through or later on) | CTR form created / modified | Employee ID Date and time CTR number (?) |
| When CTR is submitted in the BSA inquiry | CTR form submitted / locked | Employee ID Date and time CTR number (?) |
| When CTR is "deleted," either by overriding the prompt (page 22) or via the 4=Override/Cancel option on the Work With CTRs screen (page 20) | CTR form overridden / cancelled | Employee ID Date and time CTR number (?) + any text the user enters manually on the tracker screen |

New Default Memo Type Codes for the AT Tracker Type

Ideas for Memo Type codes to use for the various automated Audit Tracker conversations:

- CT CTR form
- CS CTR submit
- CO CTR override

Handling Non-Member Activity

At this time AT trackers are only created for member accounts. But both the Teller system as well as the BSA inquiry/files are set up to accept non-member activity.

Need to somehow address this issue of Trackers for non-members – for now, I think we should be able to continue with the CTR process and just plan for the system to skip only the Tracker-related steps when working with a non-member (or member of another CU, even). Eventually we will be forced to do Trackers for non-members, but not sure which project will come first!

Audit Tracker Flow Samples

(Don't think there will be screen changes, just showing samples of the screens here so it's easier to visualize the workflow.)

Access: Various access points, but one method is via
 Inquiry > Select a sub-account > F21-Tracker Review > Update
 Program: UWKCO (??)
 GOLD panel: 3016, 3014

Screen 1 - Adding a Conversation Note to a Tracker

```

7/02/09      Member Tracker Entry      16:28:27
4355-000    SUSIE Q MEMBER              Conversations: 4  UWKCO-02

Memo Type:   ?                          Speaking to: SUSIE Q MEMBER
X
X
X
X
X
X
X
=====
Date: 08/04/2008 Time: 09:19:48 Memo Type: OP OFAC/PLC Pass C
Need Group:
  OFAC scan run on 08/04/2008. No suspected match.

Follow up:      Contact:      Assigned:  Complete:
F2=Phone Inq  F3=Backup  F5=Save/Continue  F9=Contact  F10=Previous  F16=Filter
F17=Top  F18=Bottom  F19=Next  F20=Household  F21=Addl Sign  F22=Cnvrs  F23=Prt Nt
    
```

This screen should display only when "deleting" a form using override/cancel features (page 20, 22); otherwise the system just creates Tracker notes as appropriate without displaying any of the Tracker screens to the user



Screen 2 – Setting up a Follow-up

```
7/02/09                               Member Tracker Entry                               16:32:20
                                           UWKCO-03

Member Account#      4355  SUSIE Q MEMBER
Speaking with SUSIE Q MEMBER              on 07/02/09 at 16:32:20
Update Last Contact Date for this Account? Y (Y/N)
Does the entry just made require a follow-up? Y (Y/N) If so,
- what is the follow-up date?              (mmddccyy)
- who should call back?                    ;D ?
- who should be contacted?                 SUSIE Q MEMBER
```

Cmd/3-Backup

User could set this to Yes if they wanted, but not required

The screenshot shows a web browser window titled "Session 0 CLIMBASE GOLD - Member Tracker Entry". The page has a blue header with navigation icons and a "Network Links" button. The main content area is titled "Member Tracker Entry" and contains the following information:

- Member account # 4355 SUSIE Q MEMBER
- Speaking with SUSIE Q MEMBER on Jul 02, 2009 at 16:32:20
- Update last contact date for this account:
- Entry just made requires a follow-up:
- Follow-up date: [MMDDYYYY]
- Person to call back: ;D
- Contact person: SUSIE Q MEMBER

At the bottom left, there is a "Backup" button with the F3 key indicator. The status bar at the bottom shows "BT (3014) 7/02/09 16:32:20" and a "Learn About This Feature" link.

Other Tracker Screen Samples - Tracker Review Screen 1

```

7/02/09                               Member Tracker Review                               16:35:15
ITKLR-01

Select by: Date           Time
           Account Type 000 Tracker Type: ?
           Reference

Member Account#      4355  SUSIE Q MEMBER
X-View U-Update
X  Date           Time  AT Reference           Speaking With           Type Id
7/02/2009 16:35:15 000 Audit Tracker     SUSIE Q. MEMBER        AUDT 99
8/05/2003  9:15:10 000 XXXXXXXX         SUSIE Q. MEMBER        MBSR 42
4/19/2000 14:45:56 000 XXXXXX XXXXXXXX  SUSIE Q. MEMBER        MBSR 12

Cmd/3-Backup  Cmd/17-Work Followups  Cmd/20-Tracker Entry                               Bottom
    
```



Changes to BSA Inquiry

Access: MNAUDT #1 Work Daily BSA Activity
 Program: UBSAFILCL
 GOLD panel: 1705

```
*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8

5/08/09          Verify Bank Secrecy Act File          14:33:06
                  All Records                          UBSAFIL-01
X=Show Details, V=Verified, D=Delete, C=CTR
Go to Date MMDDCCYY.: .....
Go to SSN/TIN.....: .....
Date
* - Exceeds $10,000
Trans. **CTR**
Amount A E S Processed
Opt Verified By SSN/TIN Name Amount A E S Processed
4/30/09 -3 123124389 XXXXXXXXXXXXXXXXXXXXXXXX 4152.00 4/08/09
0/00/00 362564989 XXXXXXX, ROBERT C 3309.60 4/08/09
0/00/00 363641489 XXXX, STEVEN M 3000.00 4/08/09
0/00/00 365400789 XXXXXXX, LEONARD A 20643.06 * * * 4/08/09
0/00/00 365400789 XXXXXXX, LEONARD A 20648.59 * * 4/08/09
0/00/00 369788089 XXXXXXX, ROBERT T 5711.95 4/08/09
4/30/09 -3 371421089 XXXXXXX, TIMOTHY 4065.60 4/08/09
0/00/00 372060589 XXXXXXX, DONALD L 4000.00 4/08/09
0/00/00 381875689 XXXXXXXXXXX, INC. #125 6710.97 4/08/09
0/00/00 382058189 XXXXXXXXXXX COMPANY INC 5044.43 4/08/09
0/00/00 383146189 XXXXXXXXXXXXXXXXXXXX, INC. 5050.75 4/08/09
0/00/00 386026389 XXXXXXX, BRENDA A 13490.00 * 4/08/09
0/00/00 386088389 XXXXXXXXXXXX CONSERVATI 3698.00 4/08/09
0/00/00 467887189 XXXXXXX, MOISES 3000.00 4/08/09
More...

Cmd/7-CANCEL Cmd/11-Toggle View Cmd/15-Work with All CTRs
```

- Insert new CTR indicator columns after the trans amount column as shown (change both dates to display 2-digit year only and adjust column headings to make everything fit)

| | | |
|---|--|---|
| A | show * if CTR recommended / teller Alerted | <i>this is the * column that already displays but currently doesn't have any column heading</i> |
| F | show * if a CTR Form record exists for this member for this date | <i>I don't think it matters whether it was completed or not; after all, how would we know?</i> |
| S | show * if CTR has been Submitted (locked against further editing) | |

- Add new option C=CTR so they can work/create the CTR form for any of the records displayed – go to the initial screen (see page 22) of that particular CTR form
 - If no CTR exists, create a new one, filling in as much general member and transaction data as possible from the BSA record
 - If the CTR already exists but hasn't been submitted yet, display the fill-in screens and allow changes
 - If the CTR has already been submitted, then show view-only version of fill-in screens
- Add Cmd/15-Work With All CTRs to go directly to the new screen on page 20

DOC NOTE: The existing “V=Verified” feature that marks a record as worked will still be separate from the new CTR features, including the separate Submit feature that locks the CTR from further editing. This would even allow the CU to separate the functions – one person checks and submits CTRs while another verifies all BSA items against other policies/procedures (SARs, etc.).

CLPBIAS1 GOLD - Verify Bank Secrecy Act File

Verify Bank Secrecy Act File

Go to date: [] [MMDDYYYY]

Go to SSN/TIN: []

| Date Verified | By | SSN/TIN | Name | Trans. Amount | Date Processed | ID |
|---------------|----|---------|------|---------------|----------------|----|
| May 22, 2008 | 79 | | T | 7,742.57 | Feb 18, 2008 | 50 |
| 0/00/0000 | | | S | 4,572.94 | Feb 18, 2008 | 86 |
| 0/00/0000 | | | T | 115,123.50 | Feb 18, 2008 | 56 |
| Jun 13, 2008 | 09 | | S | 5,025.75 | Feb 18, 2008 | 56 |
| 0/00/0000 | | | IG | 5,268.98 | Feb 18, 2008 | 43 |
| Jun 13, 2008 | 09 | | IS | 5,000.00 | Feb 18, 2008 | 13 |
| 0/00/0000 | | | L | 4,556.05 | Feb 18, 2008 | 67 |
| Jun 19, 2008 | 09 | | S | 3,000.00 | Feb 18, 2008 | 53 |
| 0/00/0000 | | | W | 13,236.99 | Feb 18, 2008 | 72 |
| May 22, 2008 | 79 | | F | 6,500.00 | Feb 18, 2008 | 30 |
| 0/00/0000 | | | F | 4,952.40 | Feb 18, 2008 | 74 |
| Jun 30, 2008 | 09 | | R | 4,952.40 | Feb 18, 2008 | 74 |
| 0/00/0000 | | | S | 26,876.73 | Feb 18, 2008 | 70 |
| | | | K | 6,456.00 | Feb 18, 2008 | 71 |

Show Details
 Verified
 Delete

F7
 F11

X Exceeds \$10,000

(1705) 6/30/08 15:31:01 Learn About This Feature

Changes to the BSA Report

Access: MNRPTD #26 Bank Secrecy Act Report
 Program: LBSAFILSCL
 GOLD panel: 566

```

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8

7/02/09          Bank Secrecy Act Report Selection          16:20:40
                                                           LBSAFIL-01

JOBQ Y
Copies 1
Printer P1      ?      Options

Month/Year to Process . . . . . : 1208
Date Range - From . . . . . : 120108 *
Date Range - To . . . . . : 120108 *
SSN/TIN . . . . . : *
Export Report to File (Y/N) . . . . . : N

Cmd/7-CANCEL
  
```

No screen changes needed



```

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8...+...9...+...0...+...1...+...2...+...3..
  
```

| 5/01/09 12:47.04 | | TBA CREDIT UNION | | | | | LBKSC3 | | PAGE 1 | | |
|------------------|------------------------|---|--------------|------------|------------|------------|--------|-----------|-------------|------------|------------|
| RUN ON 5/01/09 | | BANK SECRECY ACT CASH REPORTING BY SSN NUMBER FOR 5/01/09 | | | | | | | USER | | |
| SOC. SEC. # | MEMBER NAME | ACCOUNT BASE | TRANS AMOUNT | TRANS TIME | TRANS TYPE | TELLER ID | SB ID | TOTAL AMT | **CASH ALRT | TRANS FORM | RPT** SUBM |
| 02-4242424 | MY OWN BUSINESS | | | | | | | 15170.22 | * | * | * |
| | MY OWN BUSINESS | 35800 | 5500.00 | 12:34.10 | CASH BACK | 92 | | | | | |
| | MY OWN BUSINESS | | 4170.22 | 12:34.34 | CASH BACK | 92 | | | | | |
| | MY OWN BUSINESS | | 5500.00 | 12:34.10 | WTHD/DISBR | 92 | | | | | |
| 111-22-2333 | MUNK CHIP | M | | | | | | 11092.14 | * | | |
| | MUNK CHIP | M | 1009 | 5000.00 | 12:33.52 | DEP/PAYMNT | 92 | | | | |
| | MUNK CHIP | M | | 546.07 | 12:33.57 | MISC RECPT | 92 | | | | |
| | MUNK CHIP | M | | 3000.00 | 12:33.47 | OUTS CHECK | 92 | | | | |
| | MUNK CHIP | M | | 32.50 | 12:33.47 | OUTS CHECK | 92 | | | | |
| | MUNK CHIP | M | | 13.57 | 12:33.47 | OUTS CHECK | 92 | | | | |
| | MUNK CHIP | M | | 2500.00 | 12:33.39 | CASH IN | 92 | | | | |
| 222-22-2333 | MYMIND GEORGIA | O | | | | | | 51300.00 | * | * | |
| | MYMIND GEORGIA | O | 1025 | 3000.00 | 12:32.14 | DEP/PAYMNT | 92 | | | | |
| | MYMIND GEORGIA | O | | 20000.00 | 12:39.11 | DEP/PAYMNT | 92 TV | | | | |
| | SHARED BRANCHING -- TV | | 77861 | 1000.00 | 12:34.53 | DEP/PAYMNT | 92 | | | | |

Change the "Message" column to be three indicator columns as shown, similar to the BSA inquiry screen

Programmer please verify if there are any other "messages" besides the "EXCEEDS \$XXXX" one and if so, can the message just overlay the asterisks or something?

New “Work With CTR Forms” Screens

Access: to be determined, but must be easily available to tellers – see Page 23
 Also via Cmd/15-Work With All CTRs on the BSA Inquiry screen – see Page 17
 Program: new
 GOLD panel: new

```

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8

1  8/03/09      Work With Cash Transaction Reports (CTRs)      14:40:14
2                                     UXXXXX-01
3  Position to date created ..... Display only acct # ..... Teller ID ..
4  2=Edit, 4=Override/Cancel Form, 5=View, 6=Submit/Lock, 7=Print Form
5                                     Date CTR   Last      Date CTR
6  Opt Tlr  Account  Member Name      Created Modified Submitted
7  -   12  123456789  123456789012345678901234567890  12/12/12  12/12/12  12/12/12
8  -   A1      332  JOHN A MEMBER      08/03/09  08/03/09
9  -   B3      499  ABC CORPORATION INC  08/01/09  08/03/09  08/03/09
10  -   A1      4397 MARY A PERSON      08/01/09  08/01/09
11
12
13
14
15
16
17
18
19
20
21
22                                     Bottom
23  Cmd/3-Backup  Cmd/6-Add New CTR  Cmd/7-CANCEL
24
  
```

- List all CTR records, sorted by date (descending order) then account #

What about non-members & Shared Branch members? Still a little hazy on this.

- Position to date created* field – this is a straight “position to” and just jumps down to that date in the list; should still be able to scroll back up or down within the full list
- Display only acct #* and *Teller ID* fields – should filter and display only those that match; can be used separately or together (clear fields and use Enter to refresh full list)
- Cmd/6-Add New CTR should create a new form with an input-capable account # field (see Page 22) so they can create a brand-new form from scratch

| Option | Description |
|------------------------|---|
| 2=Edit | Go to initial fill-in screen, allow changes If form has already been locked, display warning: Form already submitted; changes cannot be made but then when they press Enter proceed into the screen in view-only mode |
| 4=Override/Cancel Form | See instructions on Page 22 (confirm then do an Audit Tracker note w/user text) |
| 5=View | Same as 2 but view-only (no warning needed for submitted forms) |
| 6=Submit/Lock | See instructions on Page 22 (confirm then do an Audit Tracker note) |
| 7=Print Form | present a pop-up with the standard options for printing – default to the workstation’s general printer ID |

Submitting a CTR

Need to be able to flag a CTR form as submitted and lock it so it can't be changed. This might someday change to a true submit/transmit feature to submit the form electronically to the government, but for now would simply flag the record.

Submitting a form can be done from two places: Cmd/18 on the final CTR form fill-in screen (see Page 22) and via option 6 on the main CTR screen (prev page). When either of these methods is used:

- Show the standard “continue” confirmation window (see Page 22 for the message to use)
- Store the date and employee ID
 - ✎ This should then be displayed on the initial fill-in screen should they view it again in the future, as well as on the CTR list screen; will also show as an * indicator on the BSA inquiry/report
- No longer allow changes to the form once submitted
 - ✎ DOC NOTE: if they subsequently receive notification from the government that they need to correct the form and resubmit it, they will need to create a new one manually

New CTR Fill-In Screens

- Develop a series of screens that show all of the data from the CTR form (see Page 6 and Page 24), including those data elements filled in from master CU*BASE database files – they need to be able to see the entire content of the CTR, not just the custom stuff they have to enter themselves
 - I assume we should make the fields that are pulled from MASTER and other places non-input on the CTR screens (is there a precedent on similar screens for custom loan forms?)
 - It is important to understand that if multiple people are involved that the form allows for the inclusion of the “Multiple Persons” section. As stated on this form the multiple person section only applies if box 1b on the first page is checked. If it is not checked there is no need even to display the screens for input.

Initial screen:

- Needs to have a place to show a “Submitted” notation with a date and employee ID/name, after the form has been submitted in the BSA inquiry – these fields should not show at all until after it’s submitted, though
- Should show the assigned CTR #, assuming we’re doing it that way
- To create new CTR from scratch, would need input-capable account# field (and others?)
- Needs to have an **F20-Override/Cancel** function
 - First, display the standard delete confirmation window (call program CUTCDWDW) with the message:

12345678901234567890123456789012345678901234567890123456
CTR form will be removed from the database and
an Audit Tracker note will be generated
 - Then proceed to screen UWKCO-02 to start a new note in the Audit Tracker with memo type CO (can’t change the memo type, but can add text that would be appended to the generic text on page 13)

Final screen:

- F14-Print Form** (present a pop-up with the standard options for printing – default to the workstation’s general printer ID)
- F18-Submit/Lock** (also see notes on Page 21)
 - First, display the standard “continue” confirmation window (call program CUTCCWDW) with the message:

12345678901234567890123456789012345678901234567890123456
CTR form will be locked from future changes
and an Audit Tracker note will be generated
 - Create an Audit Tracker note (see Page 13) - don’t need to proceed to the tracker screens

All screens:

- F10-Save/Done** (saves to the CTR forms file but doesn’t print, since they don’t have to print now if they don’t want to or aren’t finished with the report yet)
 - Use the standard “continue” confirmation window (call program CUTCCWDW):


12345678901234567890123456789012345678901234567890123456
CTR form will be saved and an Audit Tracker
note will be generated
 - Create an Audit Tracker note (see Page 13) - don’t need to proceed to the tracker screens

Menu Changes

Note to Programmer: Menu changes are done by Dawn/Jack with the release. Can add new programs to MNNEW for testing purposes.

- Access to the new “Work With CTR Forms” feature – see page 20
 - Needs to be accessed both by tellers (to finish forms they started earlier) as well as internal auditor or other staff responsible for working BSA

Sample CTR Form (and Instructions)

| | | | |
|--|---|--|--|
| FINCEN Form 104 (Formerly Form 4789) (Eff. December 2003) Department of the Treasury FinCEN | <h2 style="margin:0;">Currency Transaction Report</h2> <p style="margin:0;">▶ Previous editions will not be accepted after August 31, 2004.</p> <p style="margin:0;">▶ Please type or print</p> <p style="margin:0;"><i>(Complete all parts that apply--See Instructions)</i></p> |  OMB No. 1506-0004 | |
| 1 Check all box(es) that apply: a <input type="checkbox"/> Amends prior report b <input type="checkbox"/> Multiple persons c <input type="checkbox"/> Multiple transactions | | | |
| Part I Person(s) Involved in Transaction(s) | | | |
| Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted | | | |
| 2 Individual's last name or entity's name | | 3 First name | 4 Middle initial |
| 5 Doing business as (DBA) | | 6 SSN or EIN | |
| 7 Address (number, street, and apt. or suite no.) | | 8 Date of birth MM / DD / YYYY | |
| 9 City | 10 State | 11 ZIP code | 12 Country code (if not U.S.) |
| 13 Occupation, profession, or business | | | |
| 14 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____ e Issued by: _____ f Number: _____ | | | |
| Section B--Individual(s) Conducting Transaction(s) (if other than above). If Section B is left blank or incomplete, check the box(es) below to indicate the reason(s) | | | |
| a <input type="checkbox"/> Armored Car Service b <input type="checkbox"/> Mail Deposit or Shipment c <input type="checkbox"/> Night Deposit or Automated Teller Machine d <input type="checkbox"/> Multiple Transactions e <input type="checkbox"/> Conducted On Own Behalf | | | |
| 15 Individual's last name | | 16 First name | 17 Middle initial |
| 18 Address (number, street, and apt. or suite no.) | | 19 SSN | |
| 20 City | 21 State | 22 ZIP code | 23 Country code (if not U.S.) |
| 24 Date of birth MM / DD / YYYY | | | |
| 25 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____ e Issued by: _____ f Number: _____ | | | |
| Part II Amount and Type of Transaction(s). Check all boxes that apply. | | | |
| 26 Total cash in \$ _____ 0.00 | | 27 Total cash out \$ _____ 0.00 | |
| 26a Foreign cash in _____ 0.00 <small>(see instructions, page 4)</small> | | 27a Foreign cash out _____ 0.00 <small>(see instructions, page 4)</small> | |
| 28 Date of transaction MM / DD / YYYY | | | |
| 29 <input type="checkbox"/> Foreign Country _____ | 30 <input type="checkbox"/> Wire Transfer(s) | 31 <input type="checkbox"/> Negotiable Instrument(s) Purchased | |
| 32 <input type="checkbox"/> Negotiable Instrument(s) Cashed | 33 <input type="checkbox"/> Currency Exchange(s) | 34 <input type="checkbox"/> Deposit(s)/Withdrawal(s) | |
| 35 <input type="checkbox"/> Account Number(s) Affected (if any): _____ _____ _____ | 36 <input type="checkbox"/> Other (specify) _____ _____ _____ | | |
| Part III Financial Institution Where Transaction(s) Takes Place | | | |
| 37 Name of financial institution | | Enter Regulator or BSA Examiner code number (see instructions) ▶ | |
| 38 Address (number, street, and apt. or suite no.) | | 39 EIN or SSN | |
| 40 City | 41 State | 42 ZIP code | 43 Routing (MICR) number |
| Sign Here ▶ | 44 Title of approving official | 45 Signature of approving official | 46 Date of signature MM / DD / YYYY |
| | 47 Type or print preparer's name | 48 Type or print name of person to contact | 49 Telephone number () - |
| ▶ For Paperwork Reduction Act Notice, see page 4. Cat. No. 37683N FinCEN Form 104 (Formerly Form 4789) (Rev. 08-03) | | | |

Multiple Persons

Complete applicable parts below if box 1b on page 1 is checked

Part I Person(s) Involved in Transaction(s)

Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted

| | | | | | | | | |
|---|--|--------------|--------------|--|--------------------------------------|---|--|--|
| 2 Individual's last name or entity's name | | | 3 First name | | | 4 Middle initial | | |
| 5 Doing business as (DBA) | | | | | | 6 SSN or EIN | | |
| 7 Address (number, street, and apt. or suite no.) | | | | | | 8 Date of birth ____/____/____ MM DD YYYY | | |
| 9 City | | 10 State | 11 ZIP code | | 12 Country code (if not U.S.) | 13 Occupation, profession, or business | | |
| 14 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____ e Issued by: _____ f Number: _____ | | | | | | | | |

Section B--Individual(s) Conducting Transaction(s) (if other than above).

| | | | | | | | | |
|---|--|--------------|---------------|--|--------------------------------------|--|--|--|
| 15 Individual's last name | | | 16 First name | | | 17 Middle initial | | |
| 18 Address (number, street, and apt. or suite no.) | | | | | | 19 SSN | | |
| 20 City | | 21 State | 22 ZIP code | | 23 Country code (if not U.S.) | 24 Date of birth ____/____/____ MM DD YYYY | | |
| 25 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____ e Issued by: _____ f Number: _____ | | | | | | | | |

Part I Person(s) Involved in Transaction(s)

Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted

| | | | | | | | | |
|---|--|--------------|--------------|--|--------------------------------------|---|--|--|
| 2 Individual's last name or entity's name | | | 3 First name | | | 4 Middle initial | | |
| 5 Doing business as (DBA) | | | | | | 6 SSN or EIN | | |
| 7 Address (number, street, and apt. or suite no.) | | | | | | 8 Date of birth ____/____/____ MM DD YYYY | | |
| 9 City | | 10 State | 11 ZIP code | | 12 Country code (if not U.S.) | 13 Occupation, profession, or business | | |
| 14 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____ e Issued by: _____ f Number: _____ | | | | | | | | |

Section B--Individual(s) Conducting Transaction(s) (if other than above).

| | | | | | | | | |
|---|--|--------------|---------------|--|--------------------------------------|--|--|--|
| 15 Individual's last name | | | 16 First name | | | 17 Middle initial | | |
| 18 Address (number, street, and apt. or suite no.) | | | | | | 19 SSN | | |
| 20 City | | 21 State | 22 ZIP code | | 23 Country code (if not U.S.) | 24 Date of birth ____/____/____ MM DD YYYY | | |
| 25 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____ e Issued by: _____ f Number: _____ | | | | | | | | |

Suspicious Transactions

This Currency Transaction Report (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 in the manner prescribed by its appropriate federal regulator or BSA examiner. (See the instructions for Item 37). If a transaction is suspicious and in excess of \$10,000 in currency, then both a CTR and the appropriate Suspicious Activity Report form 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 suspicious activity report.

General Instructions

Who Must File. Each financial institution (other than a casino, which instead must file FinCEN Form 103, and the U.S. Postal Service for which there are separate rules) must file FinCEN Form 104 (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 (1) they are by or on behalf of the same person, and (2) 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. For all other financial institutions, a business day is a calendar day.

Generally, financial institutions are defined as banks, other types of depository institutions, brokers or dealers in securities, money transmitters, currency exchangers, check cashers, and issuers and sellers of money orders and traveler's checks. Should you have questions, see the definitions in 31 CFR Part 103.

When and Where To File. This form should be e-filed through the Bank Secrecy Act E-filing System. Go to <http://bsaeifiling.fincen.treas.gov/index.jsp> to register. This form is also available for download on the Financial Crimes Enforcement Network's Web site at www.fincen.gov, or may be ordered by calling the IRS Forms Distribution Center at (800) 829-3676. File this CTR by the 15th calendar day after the day of the transaction with the:

Enterprise Computing Center - Detroit
ATTN: CTR
P.O. Box 33604
Detroit, MI 48232-5604

Keep a copy of each CTR for five years from the date filed.

A financial institution may apply to file the CTRs magnetically. To obtain an application to file magnetically, write to the:

IRS Detroit Computing Center
ATTN: CTR Magnetic Media Coordinator
P.O. Box 33604
Detroit, MI 48232-5604

Identification Requirements. All individuals (except a employees of armored car services) conducting a reportable transaction(s) for themselves or for another person, must be identified by means of an official

document(s). Acceptable forms of identification include driver's license, military and military/dependent identification cards, passport, state issued identification card, cedular card (foreign), non-resident alien identification cards, or any other identification document or documents, which contain name and preferably address and a photograph and are 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 CTR, the financial institution must indicate on the form the method, type, and number of the identification. Statements such as "known customer" or "signature card on file" are not sufficient for form completion.

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

For purposes of this CTR, the terms below have the following meanings:

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.

Organization. Entity other than an individual.

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 CTR, all traveler's checks shall also be considered negotiable instruments whether or not they are in bearer form.

Foreign exchange rate. If foreign currency is a part of a currency transaction that requires the completion of a CTR, use the exchange rate in effect for the business day of the transaction to compute the amount, in US dollars, to enter in item 26/27. The source of the exchange rate that is used will be determined by the reporting institution.

Specific Instructions

Because of the limited space on the front and back of the CTR, it may be necessary to submit additional information on attached sheets. Submit this additional information on plain paper attached to the CTR. Be sure to put the individual's or entity's name and identifying number (items 2, 3, 4, and 6 of the CTR) on any additional sheets so that if it becomes separated, it may be associated with the CTR.

Item 1a. Amends Prior Report. If this CTR is being filed because it amends a report filed previously, check Item 1a. Staple a copy of the original CTR to the amended one, complete Part III fully and only those other entries which are being amended.

Item 1b. Multiple Persons. If this transaction is being conducted by more than one person or on behalf of more than one person, check Item 1b. Enter information in Part I for one of the persons and provide information on any other persons on the back of the CTR.

Item 1c. Multiple Transactions. If the financial institution has knowledge that there are multiple transactions, check Item 1c.

PART I - Person(s) Involved in Transaction(s)

Section A **must** be completed. If an individual conducts a transaction on his own behalf, complete Section A and leave Section "B" BLANK. If an individual conducts a transaction on his own behalf and on behalf of another person(s), complete Section "A" for each person and leave Section "B" BLANK. If an individual conducts a transaction on behalf of another person(s), complete Section "B" for the individual conducting the transaction, and complete Section "A" for each person on whose behalf the transaction is conducted of whom the financial institution has knowledge.

Section A. Person(s) on Whose Behalf Transaction(s) Is Conducted. See instructions above.

Items 2, 3, and 4. Individual/Organization Name. If the person on whose behalf the transaction(s) is conducted is an individual, put his/her last name in Item 2, first name in Item 3, and middle initial in Item 4. If there is no middle initial, leave item 4 BLANK. If the transaction is conducted on behalf of an entity, enter the name in Item 2 and leave Items 3 and 4 BLANK.

Item 5. Doing Business As (DBA). If the financial institution has knowledge of a separate "doing business as" name, enter it in Item 5. For example, if Smith Enterprise is doing business as MJ's Pizza, enter "MJ's Pizza" in item 5.

Item 6. SSN or EIN. Enter the Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN) or Employer Identification Number (EIN) of the person or entity identified in Item 2. If none, write NONE.

Items 7, 9, 10, 11, and 12. Address. Enter the permanent address including ZIP Code of the person identified in Item 2. Use the U.S. Postal Service's two letter state abbreviation code. A P. O. Box should not be used by itself, and may only be used if there is no street address. If a P. O. Box is used, the name of the apartment or suite number, road or route number where the person resides must also be provided. If the address is outside the U.S., provide the street address, city, province or state, postal code (if known), and the two letter country code. For country code list go to www.fincen.gov/reg_bsaforms.html or telephone 800-949-2732 and select option number 5. If U.S., leave item 12 blank.

Item 8. Date of Birth. Enter the date of birth. Eight numerals must be inserted for each date. The first two will reflect the month, the second two the day, and the last four the year. A zero (0) should precede any single digit number. For example, if an individual's birth date is April 3 1948, Item 8 should read 04 03 1948.

Item 13. Occupation, profession, or business. If known, identify the occupation, profession or business that best describes the individual or entity in Part I (e.g., attorney, car dealer, carpenter, doctor, farmer, plumber, truck driver, etc.). Do not use nondescript terms such as businessman, merchant, store owner (unless store's name is provided), or self employed. If unemployed, or retired are used enter the regular or former occupation if known.

Item 14. If an Individual, Describe Method Used To Verify Identity. If an individual conducts the transaction(s) on his/her own behalf, his/her identity must be verified by examination of an acceptable document (see **General Instructions**). For example, check box a if a driver's license is used to verify an individual's identity, and enter the state that issued the license and the number in items e and f. If the transaction is conducted by an individual on behalf of another individual not present, or on behalf of an entity, check box "14d" "Other" and enter "NA" on the line provided.

Section B. Individual(s) Conducting Transaction(s) (if other than above). Financial institutions should enter as much information as is available. However, there may be instances in which Items 15-25 may be left BLANK or incomplete. If Items 15-25 are left BLANK or incomplete, check one or more of the boxes provided to indicate the reasons.

Example: If there are multiple transactions that, if only when aggregated, the financial institution has knowledge the transactions exceed the reporting threshold, and therefore, did not identify the transactor(s), check box **d** for Multiple Transactions.

Items 15, 16, and 17. Individual's Name. Complete these items if an individual conducts a transaction(s) on behalf of another person. For example, if John Doe, an employee of XY Grocery Store, makes a deposit to the store's account, XY Grocery Store should be identified in Section A and John Doe should be identified in section B.

Items 18, 20, 21, 22, and 23. Address. Enter the permanent street address including ZIP Code of the individual. (See the instructions for Items 7 and 9 through 12.) Enter country code if not U.S. (Reference item 12).

Item 19. SSN/ITIN. If the individual has a Social Security Number, or Individual Taxpayer Identification Number, enter it in Item 19. If the individual does not have an SSN/ITIN, enter NONE.

Item 24. Date of Birth. Enter the individual's date of birth. (See the instructions for Item 8.)

Item 25. If an Individual, Describe Method Used To Verify Identity. Enter the method used to identify the individual's identity. (See **General Instructions** and the instructions for Item 14.)

PART II - Amount and Type of Transaction(s)
Complete Part II to identify the type of transaction(s) and the amount(s) involved.

Items 26 and 27. Total Cash In/Total Cash Out. In the spaces provided, enter the total amount of currency received (Total Cash In) or total currency disbursed (Total Cash Out) by the financial institution. If foreign currency is exchanged, use the U.S. dollar equivalent on the day of the transaction (See "Foreign exchange rates"), and complete item 26a or 27a, whichever is appropriate.

If less than a full dollar amount is involved, increase that figure to the next highest dollar. For example, if the currency totals \$20,000.05, show the total as \$20,001.00.

Items 26a and 27a. Foreign cash in/Foreign cash out. If foreign currency is exchanged, enter the amount of foreign currency (Do not convert to U.S. dollars) in items 26a and 27a. Report country of origin in item 29.

Item 28. Date of Transaction. Insert eight numerals for each date. (See instructions for Item 8.)

Item 29. Foreign Country. If items 26a and/or 27a are completed indicating that foreign currency is involved, check Item 29 and identify the country. If multiple foreign currencies are involved, check box 36 and identify the additional country(s) and/or currency(s) involved.

Determining Whether Transactions Meet the Reporting Threshold.

Only cash transactions that, if alone or when aggregated, exceed \$10,000 should be reported on the CTR. Transactions shall not be offset against one another.

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 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 CTR should be completed as follows:

Cash In \$11,000 and no entry for 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 CTR should be completed as follows:

Cash In \$11,000, Cash Out \$12,000. This is because there are two reportable transactions. However, one 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 CTR should be completed as follows:

Cash In \$11,000 and no entry for 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, it is not entered on the 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 Euro's. The CTR should be completed as follows:

Cash In \$11,000, Cash Out \$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 exceed \$10,000 and must be reflected on the CTR.

Items 30-33. Check the appropriate item(s) to identify the following type of transaction(s):

- 30. Wire Transfer(s)
- 31. Negotiable Instrument(s) Purchased
- 32. Negotiable Instrument(s) Cashed
- 33. Currency Exchange(s)

Item 34. Deposits/Withdrawals. Check this item to identify deposits to or withdrawals from accounts, e.g. demand deposit accounts, savings accounts, time deposits, mutual fund accounts, or any other account held at the financial institution. Enter the account number(s) in Item 35.

Item 35. Account Numbers Affected (if any). Enter the account numbers of any accounts affected by the transactions that are maintained at the financial institution conducting the transaction(s).

Example 1: If a person cashes a check drawn on an account held at the financial institution, the CTR should be completed as follows:

Indicate negotiable instrument(s) cashed and provide the account number of the check.

If the transaction does not affect an account, make no entry.

Example 2: A person cashes a check drawn on another financial institution. In this instance, negotiable instrument(s) cashed would be indicated, but no account at the financial institution has been affected. Therefore, Item 35 should be left BLANK.

Item 36. Other (specify). If a transaction is not identified in Items 30-34, check Item 36 and provide an additional description. For example, a person presents a check to purchase "foreign currency." If multiple (more than one) foreign currencies are involved in the transaction, enter the amount of the largest foreign currency transaction in item 26a or 27a and that currency's country-code of origin in item 29. Then check box 36 and enter the additional foreign currencies amount(s) and country-code(s) of origin in the space provided.

PART III - Financial Institution Where Transaction(s) Take Place

Item 37. Name of Financial Institution and Identity of Regulator or BSA Examiner. Enter the financial institution's full legal name and identify the regulator or BSA examiner, using the following codes:

| Regulator or BSA Examiner | CODE |
|---|------|
| Comptroller of the Currency (OCC)..... | 1 |
| Federal Deposit Insurance Corporation (FDIC)..... | 2 |
| Federal Reserve System (FRS)..... | 3 |
| Office of Thrift Supervision (OTS)..... | 4 |
| National Credit Union Administration (NCUA)..... | 5 |
| Securities and Exchange Commission (SEC)..... | 6 |
| Internal Revenue Service (IRS)..... | 7 |
| U.S. Postal Service (USPS)..... | 8 |
| Commodity Futures Trading Commission (CFTC)..... | 9 |
| State Regulator..... | 10 |

Items 38, 40, 41, and 42. Address. Enter the street address, city, state, and ZIP Code of the financial institution where the transaction occurred. If there are multiple transactions, provide information of the office or branch where any one of the transactions has occurred.

Item 39. EIN or SSN. Enter the financial institution's EIN. If the financial institution does not have an EIN, enter the SSN of the financial institution's principal owner.

Item 43. Routing (MICR) Number. If a depository institution, enter the routing (Magnetic Ink Character Recognition (MICR)) number.

SIGNATURE

Items 44 and 45. Title and signature of Approving Official. The official who reviews and approves the CTR must indicate his/her title and sign the CTR.

Item 46. Date of Signature. The approving official must enter the date the CTR is signed. (See the instructions for Item 8.)

Item 47. Preparer's Name. Type or print the full name of the individual preparing the CTR. The preparer and the approving official may not necessarily be the same individual.

Items 48 and 49. Contact Person/Telephone Number. Type or print the name and telephone number of an individual to contact concerning questions about the CTR.

Paperwork Reduction Act Notice. The requested information is useful in criminal, tax, and regulatory investigations and proceedings. Financial institutions are required to provide the information under 31 U.S.C. 5313 and 31 CFR Part 103, commonly referred to as the Bank Secrecy Act (BSA). The BSA is administered by the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN). You are not required to provide the requested information unless a form displays a valid OMB control number. The time needed to complete this form will vary depending on individual circumstances. The estimated average time is 19 minutes. If you have comments concerning the accuracy of this time estimate or suggestions for making this form simpler, you may write to the **Financial Crimes Enforcement Network, P. O. Box 39, Vienna, VA 22183. Do not send this form to this office. Instead, see When and Where to File** in the instructions.