

# FINCEN SAR Filing Guide

Revision A





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# FINCEN SAR Filing Guide

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# 1. FinCEN - SAR Filing Management

#### 1.1. Overview

The Financial Crimes Enforcement Network (FinCEN) is a bureau of the U.S. Department of the Treasury. Its primary mission is to safeguard the financial system from illicit activities, such as money laundering and terrorist financing, by collecting, analyzing, and disseminating financial intelligence. FinCEN works closely with financial institutions, law enforcement agencies, and international partners to combat financial crime.

One of FinCEN's key responsibilities is managing the Suspicious Activity Report (SAR) system. SARs are reports filed by financial institutions when they detect potentially suspicious or unusual transactions that may involve money laundering, fraud, or other illegal activities. FinCEN requires these institutions to file SARs to ensure that any suspicious transactions are flagged and investigated, helping prevent and detect financial crimes. FinCEN then shares this information with law enforcement agencies and other relevant authorities to aid in investigations.

Thet aRay's Financial CCroimmpel iRainscke Management Suite, dienpcllouydeeds a robust system to aid and guide its American customers who, when working with alerts created as part of their ThetaRay crime risk management deployment, discover a financial crime risk alert deemed SAR worthy, and as such, are required by the FinCEN) bureau of the U.S. Department of the Treasury to file such a SAR report.

The remainder of this chapter covers the process steps company personnel allocated the specific required permissions, should follow to ensure a SAR report is filed according to FinCEN guidelines and thereby meets all mandatory and regulatory requirements by law.

**Warning:** Misfiling a SAR report can lead to serious consequences for the employee or employees involved, so it is of vital importance, that all the information provided, is strictly checked and verified before finally submitting the report to the FinCEN bureau agency.



Figure 1: Example of the FinCEN BSA E - (SAR) Filing System Website Header

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# 2. FINTRAC (STR) Suspicious Transaction Report Structure

Filing a FINTRAC STR report according to the requirements of FINTRAC requires accurate completion of the form sections as shown in the figure below.

**Note:** Although this guide details each section sequentially, please be aware that sequential completion is not mandatory, and the user can, if he or she wishes, complete the report in any order depending say on current availability of required data.

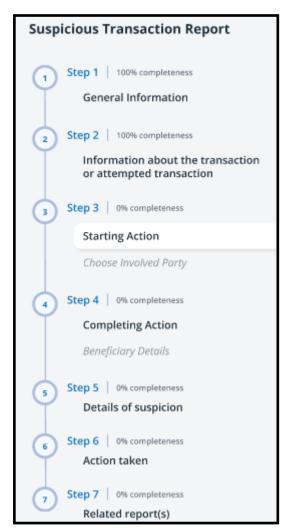


Figure 2: FINTRAC Structure Showing each step of the FINTRAC Report Step by Step

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#### 3. FinCEN File - Home

This chapter details the contents and purpose of the FinCEN SAR file Home Page. The information provided here in the home page helps SAR filing organizations to make a start in the process of submitting a FinCEN suspicious activity file that complies with Federal Government requirements.

The "Home" section serves as the starting point for creating or managing Suspicious Activity Reports (SARs). It enables users to specify the type of filing, provide any necessary references to previously submitted reports, and upload relevant attachments. This section ensures that reports are accurately categorized and referenced to streamline regulatory compliance.

## 3.1. Filing Types:

- a. **Initial Report**: For first-time reporting of suspicious activity.
- b. **Correct /Amend Prior Report**: For corrections or updates to a previously submitted report.
- c. **Continuing Activity Report**: For ongoing monitoring of previously reported suspicious activity.
- d. **Joint Report**: For submissions involving multiple financial institutions.

### 3.2. Key Required Report Information:

- a. Prior Report Identification Number: Required when filing corrections, amendments, or continuing activity reports (applicable for "Correct /Amend Prior Report" and "Continuing Activity Report").
- b. **Attachments**: Allows users to upload optional supporting documentation (e.g., transaction details, investigative notes) in a compatible format such as CSV.
- c. **Filing Institution Note**: Optional field for including additional context or notes for FinCEN.

The following figures shows examples of the 'Home" forms required to be completed.

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Home	
Filling Name Type	Attachment ①
1 Type of filling *  Initial Report  Continuing activity report  Correct/Amend prior report  Joint report  Prior report Document Control Number/BSA Identifier  Type	Drag your file(s) to start uploading  OR  OR  OAdd Attachment
2 Filing Institution Note to FinCEN  Type	Only support .csv file

Figure 3: Example SAR Form where an Initial or Continuing Activity Report File Form is Shown

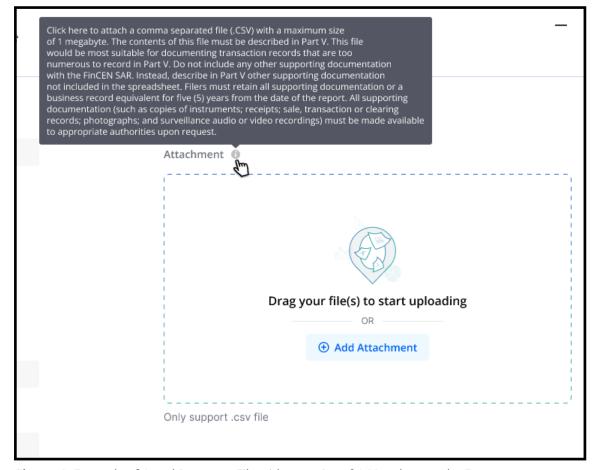


Figure 4: Example of Attaching a .csv File with max size of 1 Megabyte to the Form

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# To complete this section and with reference to the above example figures:

- 1. Select an applicable filing type from the detailed "Filing Types" section.
- 2. Continue with reference to the following guidelines:
  - a. For corrections or amendments, include the Prior Report Identification Number(BSA ID).
  - b. If the report is a "Joint Report," ensure all involved institutions are properly identified.
- 3. Upload any supporting documentation by dragging files into the designated area or using the "Add Attachment" button.
- 4. Use the "Save as Draft" option to save incomplete reports or "Save as Final Report" to submit completed reports.

### 3.3. Elaboration on Attachment Requirements:

#### 3.3.1. Core Requirements:

- 1. File Format and Size:
  - a. Attachments must be in Microsoft Excel-compatible comma-separated values (CSV) format.
  - b. The maximum file size is 1 megabyte.
- 2. Purpose of the Attachment:
  - a. The file is primarily intended for documenting **transaction records that are too numerous** to include in the "Narrative" section.
- 3. Description in the Narrative:
  - a. The contents of the attachment must be explicitly described in the "Narrative" section.
  - b. Other supporting documentation (e.g., receipts, photographs, surveillance recordings) that cannot be attached must also be described in the "Narrative."
- 4. Retention of Supporting Documentation:
  - a. Filers must retain all supporting documentation or a business record equivalent for a minimum of **five (5)** years from the date of the report.
- 5. Availability to Authorities:
  - a. All supporting documentation (e.g., copies of instruments, receipts, transaction or clearing records, photographs, audio/video recordings) must be made available to appropriate authorities upon request.
- 6. Restrictions:

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- a. No other supporting documentation should be attached to the SAR file apart from the designated CSV file.
- b. All additional details or descriptions about such documentation must be included in the "Narrative" section.

This chapter details the contents and purpose of the FinCEN SAR file Home Page. The information provided here in the home page helps SAR filing organizations to get started in the process of submitting a FinCEN suspicious activity file that complies with Federal Government requirements.

**Reference Note**: As with all the information and examples provided in this document, please see the FinCEN SAR report file form for full details.

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# 4. FinCEN File - Filing Institution Contact Information

The Filing Institution Contact Information section identifies the financial institution, holding company, agency, or individual responsible for filing the FinCEN SAR. This section ensures accurate identification of the filer and provides the necessary contact details for follow-up inquiries or regulatory purposes. It must only include information about the lead filer, as joint filer details are reported in a separate section.

## 4.1. Summary of Information Required for this Section

The following segment of the report shown below provides an example of the kind of information required in the filed SAR report.

In summary it needs to supply information such as:

- Type of financial institution
- Filer name including Holding company, if there are Securities and Futures components
- Registered address, including city
- If it has alternative name.

#### 4.2. Core Elements in Section

- 1. **Primary Federal Regulator** (Item 75):
  - a. Select the appropriate regulatory agency overseeing the financial institution's compliance with the Bank Secrecy Act (BSA).
  - b. Options include:
    - i. Federal Reserve Board (FRB), FDIC, IRS, SEC, among others.
    - ii. Use "Internal Revenue Service (IRS)" for Casinos, MSBs, or institutions subject to U.S. law but not covered by other agencies.
- 2. **Filer Name** (Item 76):
  - a. Enter the full legal name of the filing institution or individual (if a sole proprietorship).
- 3. **Taxpayer Identification Number** (TIN) (Items 77 & 78):
  - a. Provide the TIN (U.S. or foreign) of the filer and specify the type (e.g., EIN, SSN/ITIN, or Foreign).
- 4. **Type of Financial Institution** (Item 79):

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- a. Identify the filer's institution type (e.g., Depository Institution, Insurance Company, MSB).
- b. Select "Other" if no predefined categories apply and provide additional details in Part V.

#### 5. Securities and Futures Type (Item 80):

a. If the institution is a Securities or Futures entity, select all relevant categories (e.g., Clearing Broker, Investment Adviser, etc.).

#### 6. Filing Institution Identification Numbers (Item 81):

a. Include identifiers such as Central Registration Depository (CRD) number, SEC number, or other applicable registration numbers.

#### 7. **Contact Information** (Items 82–94):

- a. Provide the filing institution's address, including country and postal code.
- b. Record contact office details, such as name, phone number, and extension (if applicable).
- c. Enter law enforcement contact information, including agency name, contact name, phone number, and the most recent contact date (if applicable).

#### 8. Filing Date (Item 95):

a. Specify the date the SAR is filed (automatically generated for discrete filers).

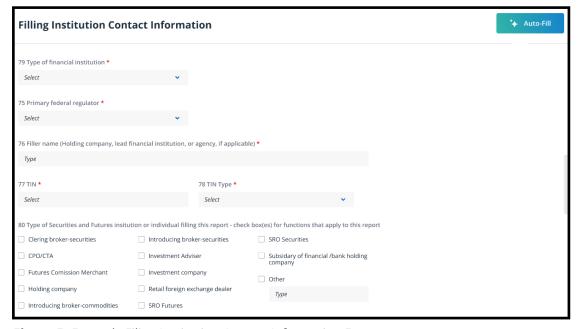


Figure 5: Example Filing Institution Contact Information Form

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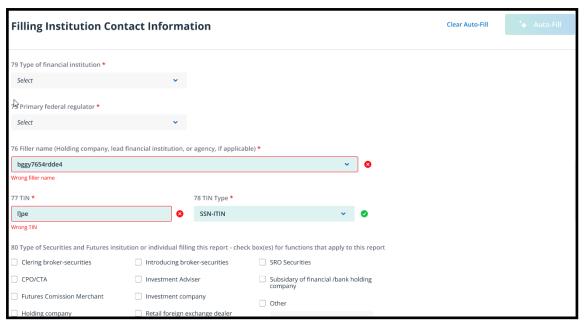


Figure 6: Institution Contact Information Verification - Accept - Reject Process

# To complete this section and with reference to the above example figures:

- 1. Ensure only one Part IV record is included in each SAR, representing the lead filing institution.
- 2. For joint filings, use Part III to record the joint filer's details.
- 3. Provide complete and accurate information for all required fields (indicated by an asterisk).
- 4. If the filing institution is a sole proprietorship, the individual's personal identifying details (e.g., SSN/ITIN) must be entered.
- 5. Contact information for law enforcement agencies and the filing institution must be clear and updated for regulatory follow-up.
- 6. Use the appropriate date format: MM/DD/YYYY for discrete filers and YYYYMMDD for batch filers.

**Reference Note**: As with all the information and examples provided in this document, please see the FinCEN SAR report file form for full details.

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# 5. FinCEN File - Filing Institution where Activity Occurred

The Filling Institution Where Activity Occurred section captures detailed information about each financial institution or agent involved in the reported suspicious activity. This section ensures accurate tracking of all institutions and branches linked to the activity, enabling comprehensive analysis and compliance reporting.

Its scope includes for example:

- Type of financial institution
- If related type of gaming institution
- Type of Securities and Futures institution if related
- Financial Institution registered Identification details
- Legal Name
- If the suspicious activity occurred at a related branch or office

#### 5.1. Core Elements:

#### 1. **Type of Financial Institution** (Item 51):

- a. Specify the institution's type (e.g., Depository Institution, Insurance Company, Casino /Card Club).
- b. If the institution does not fit predefined categories, select "Other" and provide a brief description.

#### 2. **Primary Federal Regulator** (Item 52):

- c. Identify the regulatory body overseeing compliance with the Bank Secrecy Act(BSA).
- d. Select "IRS" for Casinos, MSBs, or Insurance Companies. Use "Not Applicable" for foreign or non -U.S. institutions.

#### 3. Gaming Institution Type (Item 53):

- a. For gaming institutions, indicate the specific type (e.g., State Licensed Casino, Tribal Authorized Casino).
- b. Choose "Other" if none apply and provide additional details.

#### 4. **Securities and Futures Institution Type** (Item 54):

- a. For Securities /Futures entities, check all applicable subcategories (e.g., Clearing Broker, Investment Adviser).
- b. Use "Other" if the institution type is not listed and provide a description.

#### 5. **Financial Institution Identification Numbers** (Item 55):

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a. Provide any applicable identifier such as CRD, IARD, RSSD, or SEC numbers.

#### 6. Role in Transaction (Item 56):

a. Indicate whether the institution acted as a Selling Location, Paying Location, or Both.

#### 7. Legal Name (Item 57):

- a. Enter the institution's full legal name or, for sole proprietorships, the individual's full name.
- b. If unknown, leave blank and check the "Unknown" box.

#### 8. Alternate Names and TIN Information (Items 58–60):

- a. Record DBA names or AKAs for entities/individuals.
- b. Provide the TIN (Taxpayer Identification Number) and specify its type (e.g., EIN, SSN/ITIN, or Foreign).

#### 9. **Financial Institution Address** (Items 61–65):

- a. Enter the complete address, including street, city, state/province, ZIP/Postal Code, and country.
- b. Check the "Unknown" box for items with missing data.

#### 10. Internal Control/File Number (Item 66):

- a. Assign a unique reference number for internal tracking.
- 11. Loss to Financial Institution (Item 67):
  - a. Report the amount of loss incurred due to the suspicious activity.
  - b. For continuing reports, include the loss amount for the current report and summarize cumulative losses in Part V.

#### 12. **Branch Information** (Items 68–74):

- a. Provide details of any branches involved in the activity (e.g., Selling/Paying Locations, Branch Addresses, RSSD numbers).
- b. If multiple branches are involved, submit a separate entry for each branch

An example of the related part of the where activity occurred SAR form is shown below.

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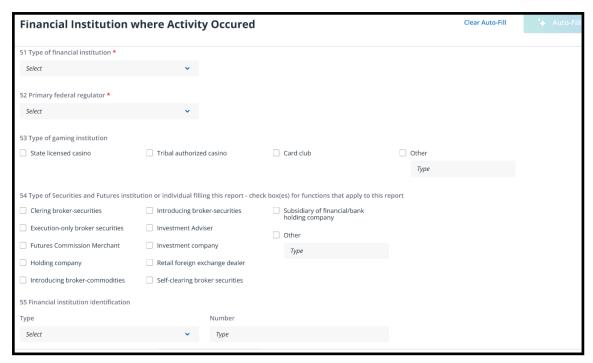


Figure 7: Example Information Where Activity Occurred Form

# >> To complete this section and with reference to the above example figures:

- 1. For joint reports, submit a separate record for each joint filer in Part III. Ensure a Part III record is completed for each institution or agent involved in the suspicious activity.
- 2. Branch information must be recorded under specific branch address fields (Items 68–74).

**Note:** Do not combine branch and agent data in the same section.

- 3. For foreign institutions, use "Not Applicable" where U.S.-specific requirements (e.g., State, ZIP Code) do not apply.
- 4. Provide a clear and detailed description in Part V when required (e.g., for "Other" categories or joint filer relationships).

**Reference Note**: As with all the information and examples provided in this document, please see the FinCEN SAR report file form for full details.

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# 6. SAR File - Subject Information

The Subject Information section is used to document detailed information about each known individual or entity involved in the suspicious activity. If no specific subjects are identified, this section provides a means to indicate that all critical information about subjects is unavailable. This ensures compliance and aids law enforcement in investigations.

This subject information also covers information about persons who are are not subjects and should not be included in this section. Also included in this section is in formation such as:

- Entity status
- If some of the critical information is not yet available.
- If person described is an entity or individual
- Entity's last name and / or legal name

#### 6.1. Core Elements:

#### 1. Subject Type:

- a. Specify if the subject is an Entity (Item 3a) or if all critical information is Unavailable (Item 3b).
- b. If all subject details are unknown, check "Unavailable" and provide details about the nature of unknown subjects in the narrative.

#### 2. Subject Name:

- a. Record the individual's Last Name or entity's Legal Name (Item 4) and First Name (Item 5), if known.
- b. Include Middle Name (Item 6) and Suffix (e.g., Jr., III) where applicable (Item 7). If unknown, check the respective "Unknown" boxes.

#### 3. Subject Details:

- a. Gender (Item 8): Indicate Male, Female, or Unknown (applicable only to individuals).
- b. Alternate Names (Item 9): Include aliases (AKA) for individuals or DBA names for entities, if applicable.

#### 4. Occupation or Business Type:

- a. Provide specific descriptions of the subject's occupation or business (Item 10), such as "Financial Analyst" or "Retail Electronics Store."
- b. Include a NAICS Code for the occupation or business type (Item 10a).

#### 5. Subject Address:

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- a. Enter the complete permanent address, including Street Address (Item 11), City (Item 12), State (Item 13), ZIP /Postal Code (Item 14), and Country Code (Item 15).
- b. Mark "Unknown" if any details are unavailable.

#### 6. Taxpayer Identification Number (TIN):

- a. Record the subject's TIN (Item 16) or foreign equivalent without formatting or punctuation.
- b. Specify the TIN Type (Item 17): Choose SSN/ITIN, EIN, or Foreign.

#### 7. Form of Identification:

- a. Provide identification details (Item 18), including type (e.g., Driver's License, Passport, Business License), number, issuing state, or country.
- b. Select "Unknown" if no identification information is available.

#### 8. Additional Information:

- a. Date of Birth (Item 19): Use the format MM/DD/YYYY or YYYYMMDD.
- b. Phone Numbers (Items 20 and 21): Include all known numbers and extensions.
- c. Email Address (Item 22) and Website URL (Item 22a): Enter if available.

#### 9. **Corroborative Statement**:

a. Indicate whether the subject made a statement admitting involvement in the suspicious activity (Item 23). Record relevant details in the narrative.

#### 10. Relationship to Financial Institution:

- a. Specify the subject's relationship with the institution (Item 24), such as Employee, Shareholder, or Director.
- b. Indicate the relationship status (Item 25) and provide the date of action (Item 26), if applicable.

#### 11. Accounts and Roles in Activity:

- a. Document any account numbers related to the subject (Item 27), including foreign accounts.
- b. Specify the subject's role in the suspicious activity (Item 28): Purchaser/Sender, Payee/Receiver, or both.

An example of Subject Information form details in the SAR report is shown below.

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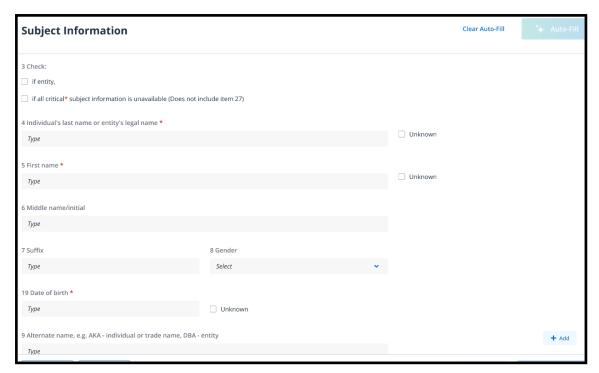


Figure 8: Example of the Subject Information Form

# >>> To complete this section and with reference to the above example figures:

- 1. Avoid including information about victims. If relevant, record such details in the narrative.
- 2. For unknown subjects, complete one record with "Unknown" checked and explain further in the narrative.
- 3. Ensure all information is accurate. Use the narrative section to clarify or provide additional details.

**Reference Note**: As with all the information and examples provided in this document, please see the FinCEN SAR report file form for full details.

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# 7. FinCEN - Suspicious Activity Information

This section captures comprehensive details about the suspicious activity being reported, including the amount involved, dates of occurrence, and specific types of activities. This information is critical for accurately identifying, categorizing, and analyzing suspicious behavior.

Characterizations of Suspicious Activity:

- The activity category enables the recording of the various types of suspicious activity being reported.
- If a category is applicable but none of the options within the category apply, the filer should use the 'other' box and briefly describe the suspicious activity in the associated text field.

#### 7.1. Core Elements:

#### 1. Amount Involved:

- a. Record the total monetary amount related to the suspicious activity (Item 29).
- b. If unknown, check "Amount Unknown" or "No Amount Involved" as applicable.

#### 2. Date or Date Range:

- a. Enter the specific date or range during which the suspicious activity occurred (Item 30).
- b. Use precise dates or the best-estimate date range, if necessary.

#### 3. Cumulative Amount:

a. For continuing reports, provide the total cumulative amount of all related reports (Item 31).

#### 4. Types of Suspicious Activity:

- a. Identify all relevant categories of suspicious activity (Items 32-41). Examples include:
  - i. Structuring (e.g., avoiding reporting thresholds).
  - ii. Fraud (e.g., ACH, securities, or healthcare fraud).
  - iii. Money laundering (e.g., funnel accounts, suspicious wire transfers).
  - iv. Cyber events (e.g., denial-of-service attacks, phishing attempts).
- b. Use the "Other" option to describe activities not explicitly listed.

#### 5. **Product Types Involved**:

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a. Specify the product types implicated in the suspicious activity, such as bonds, mortgages, or deposit accounts (Item 45).

#### 6. Instrument /Payment Mechanisms:

a. Record the payment mechanisms used, including cashier's checks, money orders, or foreign currency (Item 46).

#### 7. **Commodity Types** (if applicable):

a. If commodities are involved, describe their types and associated markets (Items 47 and 49).

#### 8. Product/Instrument Descriptions:

a. Provide further details about the products or instruments involved to clarify the suspicious activity (Item 48).

#### 9. Market and CUSIP:

a. Specify the trading market and CUSIP number for any securities-related suspicious activities (Items 49 and 50).

#### **Example - Suspicious ActivityInformation Form**

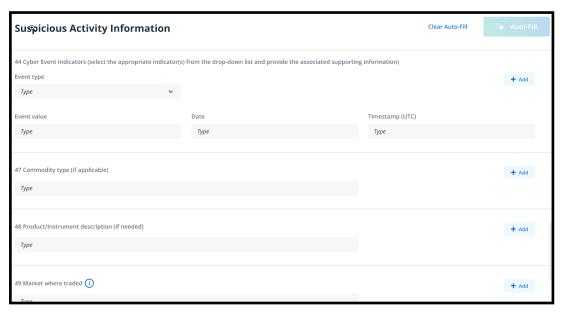


Figure 9: Example (Partial) Suspicious Activity ThetaRay Compatible Form

# To complete this section and with reference to the above example figure:

- 1. Avoid approximations, such as entering nominal values (e.g., \$1) when the actual amount is unknown.
- 2. Use the narrative to explain unknown amounts, date ranges, or other ambiguous details.

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3. Ensure accuracy and completeness in selecting activity types, payment methods, and product descriptions.

**Reference Note**: As with all the information and examples provided in this document, please see the FinCEN SAR report file form for full details.

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#### 8. SAR FinCEN File - Narrative

The narrative section is the cornerstone for understanding the context and details of the suspicious activity reported. It should provide a clear, complete, and concise description of the events, highlighting what was unusual or irregular and why it raised suspicion.

The care with which the narrative is completed may determine whether the described activity and its possible criminal nature are clearly understood by investigators.

#### Main points about the SAR narrative:

- 1. It provides the ability to add an attachment to the SAR.
- 2. Its implementation provides for a change in the max number of characters that can be entered into the narrative section.
- 3. Please note the attachment is not a substitute for the narrative itself.

#### 8.1. Core Elements:

#### 1. Comprehensive Description:

- a. Provide a chronological and detailed account of the suspicious activity.
- b. Include all necessary information that connects and explains data from other sections, such as financial transactions, individuals involved, and their roles.

#### 2. Additional Information:

- a. Include details not fully captured in other sections, such as unknown amounts, date ranges, or other explanations.
- b. Reference corresponding field numbers where additional details are provided.

#### 3. Supporting Documentation:

- a. Clearly describe any supporting documents (e.g., transaction records, communication evidence) while retaining these for five years as required.
- b. Avoid attaching documentation directly to the narrative unless it is in an approved format (e.g., CSV files for transaction data).

#### 4. Clarifications and Context:

- a. Explain whether the activity was completed or only attempted.
- b. Note any financial benefits, beneficiaries, or evidence of concealment or deceptive behavior.

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c. Identify whether the activity is an isolated event or part of a broader pattern.

#### 5. Involvement of Foreign Entities:

a. If applicable, provide details about foreign currencies, countries, or individuals, including any associated identifiers (e.g., passport numbers or account details).

#### 6. Connections and Litigation:

- a. Indicate any links to ongoing litigation or broader suspicious activities.
- b. Provide insight into insider relationships or policy violations if relevant.

#### 7. **314(b) Information**:

a. Include a statement indicating the inclusion of information under the 314(b) Voluntary Information Sharing Program, if applicable.

An example of the narrative segment of the SAR report form is shown below.



Figure 10: Example SAR Narrative Form

### >>> To complete this section and with reference to the above example figure:

- 1. Language: Ensure the narrative is written in clear and concise English.
- 2. Avoid Repetition: Do not duplicate information unless necessary for clarity.
- 3. Tabular Data: Use attachments for detailed tabular data rather than including it in the narrative text.
- 4. Confidentiality: Exclude legal disclaimers and avoid recording victim information unless essential for understanding the activity.

**Reference Note**: As with all the information and examples provided in this document, please see the FinCEN SAR report file form for full details.

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# 9. FinCEN File - Uploading, Tracking & Messaging

Now you have completed the SAR data filing component, what's next? Upload, tracking and messaging FinCEN regarding the file report as it is processed.

## 9.1. Upload

#### >>> To upload the completed report:

With reference to the example figure below.

- 1. If not already logged into your FinCEN account this is the first step.
- 2. Attach the completed or batch pdf report.
- 3. Enter your 8-digit PIN.
- 4. Click Submit.



Figure 11: Example Submit Report Upload

### 9.2. View Outbox - File Tracking

The purpose of the outbox is to act as a mailbox and provide you with the tracking status of your uploaded file report as it starts its journey for verification by FinCEN.

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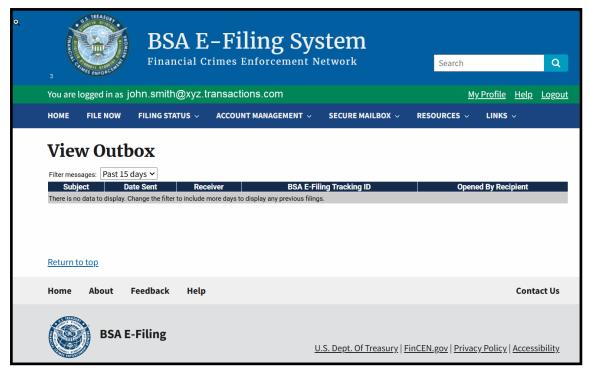


Figure 12: Example View Outbox

As you can see from the example figure above, the information shown in the View Outbox is related to the SAR file uploaded.

## 9.3. View Inbox - File Tracking

The purpose of the View Inbox is to act as a mailbox repository and provide you with updated information and feedback regarding submitted SAR reports from FinCEN (accepted, required changes or rejected).

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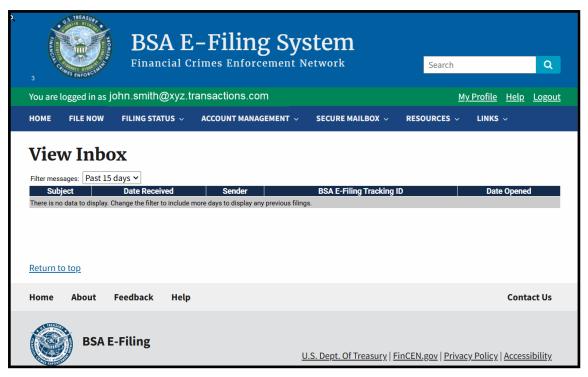


Figure 13: Example View Inbox

## 9.4. Submit Secure Message

The Submit Secure messaging enables you to reply to and create new messages to FinCEN as and when the need arises.



Figure 14: Submit Secure Messages 1/2

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REMINDER:

New Message Instructions: When submitting a new message, select Download Secure Message Form from the menu bar's "Secure Mailbox" drop-down list (above). Then prepare the message (pdf) form offline, save a local copy and attach to this page for submission.

Reply Message Instructions: When submitting a reply message, select the "Reply" option from the View Inbox page for the message you wish to reply to. Then prepare the reply message offline, save a local copy and attach to this page for submission.

Attach Secure Message Form

Attach your prepared secure message form (new message or reply message) below.

IMPORTANT: Please do NOT attach CTR, SAR, FBAR, DOEP, 8300, or RMSB data to this page. Instead, please use the File Now link to upload BSA data associated with these form types.

Choose File No file chosen

Send Message

Figure 15: Example Submit Secure Message 2/2

With reference to the above example forms and depending on the type of message to be sent:

- Download and complete a secure message form
- If you are replying to a request from FinCen select reply from the view inbox
- Pay attention to the **Important** note
- If there is anadditional file to be sent then navigate to and select
- Finally click the Send Message button

# 9.5. FinCEN Transaction XML Upload

If formally requested by FinCEN to submit transaction data in XML format in reference to the uploaded SAR report, then refer to the figure shown below.

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Figure 16: Example FinCEN Transaction XML Upload

- 1. When uploading data file in XML format pay attention to the Important note.
- 2. Enter a unique name for the file (for tracking purposes)
- 3. Navigate to, and chooses file.
- 4. When complete, click Submit to send.

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