

**BANK SECRECY ACT CURRENCY TRANSACTION REPORT (FinCEN Form 104) REVIEW CHECKLIST**

Name on CTR:

Transaction Date:

FinCEN FORM 104 DESCRIPTION	YES	NO	N/A	COMMENTS
<b>PART I - SECTION A : BENEFICIARY OF TRANSACTION</b>				
1a. <b>Is this an amended CTR?</b> 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 that are being amended.				
1b. <b>Was this box checked because the transactions were conducted by one or more individuals or on behalf of more than one person?</b> If joint accounts are involved, remember to check box <i>b</i> and <b>complete additional Section A</b> for multiple persons. (Page 2 of the CTR form). The instructions are identical for items 2 through 14 below.				
1c. <b>Is this CTR the result of two or more transactions for the same person or organization?</b> If more than one individual is known to have conducted the transaction, <b>complete additional Section B</b> for multiple transactions. (Page 2 of the CTR form). The instructions are identical for items 15-25 below.				
<b>SECTION A MUST ALWAYS BE COMPLETED - PART I - Section A</b>				
2. <b>Was the individual's correct last name or the organization's correct name indicated?</b> If more than one individual benefitted from reported transaction(s), provide information on others on page 2 of the CTR form. If entity is a sole proprietor, list individual's first, middle initial and last name in its entirety in Item 2. Note DBA information in Item 5.				
3. <b>Was the individual's correct first name indicated in full?</b> An initial is not acceptable.				
4. <b>If there is no middle initial, leave blank.</b>				
5. <b>Was a DBA indicated for an organization?</b> Many sole proprietors or holding companies use a DBA. Indicate if known. For example, Blendon Enterprises, Inc. DBA Decorating Solutions.				
6. <b>Is a SSN input for the individual or an EIN for the entity?</b> United States citizens who are two years or older are required by law to have a social security number if they file federal income tax returns or are dependents of individuals who file annual income tax returns. If none, write "NONE"				
7. <b>Is a physical street address provided?</b> Post office boxes alone are not acceptable. A rural box address is acceptable if it is representative of a physical address. Spell out Street, Drive, Route, etc. No abbreviations are allowed.				
8. <b>Is the date of birth properly entered with two digits each for the month and day and four digits for the year?</b> No entry is required for an organization.				
9. <b>Is the city's name clearly written?</b>				
10. <b>Is the state indicated by using the post office's two letter abbreviation code?</b>				
11. <b>Is a 5-digit Zip code clearly noted?</b>				
12. <b>Was this space left blank if the address is in the USA?</b> If not in the USA, indicate country of address. Use the 2-letter foreign country code listed in Exhibit 6.C in this program, or from FinCEN's website or via telephone (800) 949-2732, Option 5.				
13. <b>Is the occupation specifically identified?</b> If beneficiary is a business, the principal line of business should be listed. Example: "Self-employed carpenter" is preferable to "Self-employed". "Car salesman" is preferable to "Salesman". <b>Do not use non-specific terms like merchant, businessman, etc.</b> Housewife, student, or retired auto mechanic is acceptable.				
14. <b>If the beneficiary is an individual conducting the transaction, was the identification document (containing photo and address) properly identified?</b> Issuer and identification number should be noted in items <i>e.</i> and <i>f.</i> If the transaction was conducted by someone other than the beneficiary, or the beneficiary is an organization, enter N/A in Item 14. Entries such as "visual identification", "known customer", or "signature card on file" are not acceptable!				

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<b>PART I - SECTION B : INDIVIDUALS CONDUCTING TRANSACTION OTHER THAN BENEFICIARY</b>				
There are only a few cases where Section B may be left <b>blank or incomplete</b> . Check one or more boxes ( <i>a</i> through <i>e</i> ) immediately under Section B, to indicate reason(s) why Items 15 - 25 are blank or incomplete. Section B is completed when an individual conducting a transaction does not also benefit from the transaction. An individual identified in Section A would <u>never</u> be identified again in Section B.				
a. <b>Armored Car services</b> are exempt from Section B requirements. Check box <i>a.</i> indicating the armored car service conducted the transaction. The name of the armored service is not required, nor is any information required of the service's employees.				
b. <b>Mail deposits or shipments can be made without the bank's knowledge of who forwarded the transaction.</b> Check this box to justify the lack of Section B information.				
c. <b>Check box <i>c.</i> when transactions were conducted through the night depository or automated teller machines without the bank's knowledge of who conducted the transaction.</b>				
d. <b>Multiple transactions can occur throughout the business day without the bank's knowledge that the aggregate reporting limit of \$10,000 has been exceeded.</b> If box <i>d.</i> is checked, box <i>c.</i> in Item 1 at the very top of the form should <b>always</b> be checked. Check box <i>d.</i> only when the transactions would have been conducted without the bank's knowledge and some or all information may not be available. Box <i>d</i> in Section B is <b>never</b> checked when Section B is complete!				
e. <b>Check box <i>e.</i> to indicate that the beneficiary conducted the transaction on his/her own behalf.</b>				
15. <b>Was the individual's correct last name indicated?</b> If more than one individual benefitted from reported transaction(s), provide information on back of the CTR.				
16. <b>Was the individual's correct first name indicated in full?</b> An initial is not acceptable.				
17. <b>If there is no middle initial, leave blank.</b>				
18. <b>Is a physical street address provided?</b> Post office boxes alone are not acceptable. A rural box address is acceptable if it is representative of a physical address. Spell out Street, Drive, Route, etc. No abbreviations are allowed.				
19. <b>Is a SSN input for the individual or an EIN for the entity?</b> United States citizens who are two years or older are required by law to have a social security number if they file federal income tax returns or are dependents of individuals who file annual income tax returns. If none, write "NONE".				
20. <b>Is the city's name clearly written?</b>				
21. <b>Is the state indicated by using the post office's two letter abbreviation code?</b>				
22. <b>Is a 5-digit Zip code clearly noted?</b>				
23. <b>Was this space left blank if the address is in the USA?</b> If not in the USA, indicate country of address. Use the 2-letter foreign country code listed in Exhibit 6.C in this program, or from FinCEN's website or via telephone (800) 949-2732, Option 5.				
24. <b>Is the date of birth properly entered with two digits each for the month and day and four digits for the year?</b> No entry is required for an organization.				
25. <b>If the beneficiary is an individual conducting the transaction, was the identification document (containing photo and address) properly identified?</b> Issuer and identification number should be noted in items <i>e.</i> and <i>f.</i> If the transaction was conducted by someone other than the beneficiary, or the beneficiary is an organization, enter N/A in Item 25. Entries such as "visual identification", "known customer", are not acceptable!				

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<b>PART II - AMOUNT AND TYPE OF TRANSACTION(S). CHECK ALL BOXES THAT APPLY</b>				
26. <b>Were cash-in and cash-outs segregated and total cash-in reported here?</b> Round cents up to next dollar amount. Example: \$123.08 should be inserted as \$124. If foreign currency is exchanged, use the U.S. Dollar equivalent on the day of the transaction <b>and</b> also complete 26a or 27a as appropriate. The \$10,000 CTR threshold should be based on U.S. Dollar equivalent.				
26a. <b>Foreign Currency Cash In</b> - If foreign currency is exchanged, enter the amount in foreign currency here. U.S. Dollar equivalent should be noted in Item 26. Enter country of origin in Item 29.				
27. <b>Were cash-in and cash-outs segregated and total cash-out reported here?</b> Round cents up to next dollar amount. Example: \$123.08 should be inserted as \$124. If foreign currency is exchanged, use the U.S. Dollar equivalent on the day of the transaction <b>and</b> also complete 26a or 27a as appropriate. The \$10,000 CTR threshold should be based on U.S. Dollar equivalent.				
27a. <b>Foreign Currency Cash Out</b> - If foreign currency is exchanged, enter the amount in foreign currency here. U.S. Dollar equivalent should be noted in Item 27. Enter country of origin in Item 29.				
28. <b>Was the banking date (business day) of the transaction reported here?</b> (Two digits each for the month and day and four digits for the year)				
29. <b>Was this box checked to indicate that foreign currency was involved (deposit, exchanges of currency, etc.)?</b> If so, the currency's country of issue should be listed. If multiple countries are involved, list country with highest dollar amount. If multiple countries, check box 36 (Other) and identify additional countries and/or currencies. If foreign currency was <b>exchanged</b> , item 33 <b>and</b> either 26a or 27a must <b>also</b> be checked.				
30. <b>Was this item checked to identify reportable transaction(s) as a wire sent or wire received?</b> Transaction(s) are reportable only if over \$10,000 in cash was brought in to be wired out or the wire recipient requested proceeds in cash in excess of \$10,000.				
31. <b>Was a cashier's check, teller check, or other official bank negotiable item purchased for more than \$10,000 in cash?</b> (Note: It is <b>not</b> a reportable transaction when a customer withdraws directly from their own account to purchase the instrument!)				
32. <b>Was a check, draft, money order, or other negotiable instrument cashed in excess of \$10,000?</b> (Note: If an on-us check is cashed from an account other than the beneficiary's account, if any, check Item 32. If the customer cashes a check out of their <b>own</b> account, check Item 34 to indicate a <b>withdrawal</b> . Note the account numbers of all on-us accounts involved in Item 35, regardless of ownership. Cashing of payroll checks by employees is <b>not</b> reportable for the employer as long as checks aggregated for one individual do not exceed \$10,000.00.)				
33. <b>Was this item checked indicating one currency was exchanged for currency issued by another country?</b> Item 29 should always be checked with the country, other than the US, identified in the space provided. Note multiple countries in Item 36.				
34. <b>Was this item checked identifying reportable transaction(s) as either deposits or withdrawals, or both, made to accounts at the filing bank?</b> Cash-back transactions should be reported in Items 32 and 27. If the customer <b>also</b> deposited in excess of \$10,000 in cash, Items 34 and 26 would be checked.				
35. <b>Was this checked indicating a reportable transaction affecting an account maintained by a customer of the bank and the account number(s) listed?</b> Bank-owned accounts (i.e. cashier's checks, etc.) need not be listed. <b>All</b> accounts affected which are maintained at the bank must be listed. Therefore, if a business or individual got <b>cash back</b> in excess of \$10,000 from a deposit that included one or more individual on-us checks, <b>each</b> check in the deposit that is drawn on the filing bank must be identified. Attach additional sheets, if necessary, to identify all accounts. <b>Refer to item 50.</b>				
36. <b>Was this item checked and a brief description entered to identify a reportable transaction that did not meet one of the Items 26 through 35 above?</b> An example of proper use of Item 36 would be to indicate a loan payoff in cash exceeding \$10,000. Write "loan payoff" as description and check Item 35 and indicate loan account number in space provided.				

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<b>PART III - FINANCIAL INSTITUTION WHERE TRANSACTION TAKES PLACE</b>				
37. Was the institution's full legal name listed here?				
37a. Was the institution's federal regulator (or BSA Examiner code, if different from regulator) properly indicated? 1 - OCC 2 - FDIC 3 - FRS 4 - OTS 5 - NCUA 6 - SEC 7 - IRS 8 - USPS 9 - CFTC 10 - State Regulator				
38. Was the street address of the institution's office where the transaction occurred listed here? If multiple transactions occurred at different bank locations, enter the address of the office completing the CTR. Spell out street names; no abbreviations.				
39. Was the institution's EIN indicated in this item?				
40. Is the city's name clearly written?				
41. Is the state indicated by using the post office's two letter abbreviation code?				
42. Is a 5-digit Zip code clearly noted?				
43. Was the depository institution's MICR number entered properly here, without any hyphens or other separators? If separate MICR numbers are assigned to different branches or regions, use MICR number corresponding to the location where the transaction occurred. If transactions occurred at multiple locations, use the MICR numbers representing where the CTR was completed.				
44. Was the title of the individual who reviews and authorizes the CTR's filing identified?				
45. Did the approving official, noted in Item 44, sign the CTR? No preprinted or facsimile signatures are acceptable.				
46. Was the date that the form was signed by the approving official noted here? Is the date properly entered with two digits each for the month, day, and year? The review date may not always be the same as the transaction date. This date and the actual filing date should be within 15 calendar days after the transaction date. If the institution files electronically, a CTR must be filed within 25 calendar days after the transaction date.				
47. Was the full name of the actual preparer of the form indicated here? Although not required, it is preferable to have two different individuals prepare and review the form.				
48. Was the institution's contact person identified here? Although acceptable, do not list a department name here as your contact. It is preferred to name an individual to be contacted to discuss the CTR.				
49. Was the contact person's telephone number provided?				
50. In order for any attached sheets to be clearly associated with the original CTR, include the following identification information: i) Bank Name; ii) Transaction Date; iii) Name(s) of Person(s) or Organization Identified in Section A as a Beneficiary of Transaction; iv) Taxpayer Identification Number(s) (TIN) on the Currency Transaction Report.				

Preparer \_\_\_\_\_ Date \_\_\_\_\_

Reviewer \_\_\_\_\_ Date \_\_\_\_\_