

## BRANCH SUSPICIOUS ACTIVITY REPORT

1. <b>*WHO</b> (Suspect Name)	*Tax ID/EIN	*Birth Date	*Profession	*Physical Address	*DL/ID #	*Phone #

**2. \*What category does this report belong in? \* indicates "most common"**

<input type="checkbox"/> Computer Intrusion	<input type="checkbox"/> Credit Card Fraud	<input type="checkbox"/> * Kiting	<input type="checkbox"/> * Lottery Scheme	<input type="checkbox"/> Mysterious Disappearance	<input type="checkbox"/> * Tax Evasion	<input type="checkbox"/> Wire Fraud
<input type="checkbox"/> * Counterfeit Check	<input type="checkbox"/> ID Theft	<input type="checkbox"/> Loan Fraud	<input type="checkbox"/> * Money Laundering	<input type="checkbox"/> * Structuring	<input type="checkbox"/> Terrorist Activity	<input type="checkbox"/> Other

**3. Account #'s Involved & Date Opened:**

**4. \*Explain The Activity In Detail (WHAT and HOW):**

**5. \*WHERE Did The Activity Take Place? (Include All Locations Involved):**

**6. \*Explain WHY You Think This Activity Is Suspicious. (For Help Please Refer To The Information Provided On This Form).**

**7. \*WHEN Did The Activity Occur?:**

From:  Through:

**8. List Any Other Individuals Involved:**

**9. \*Branch Preparing Report:**


**10. \*Report Prepared By:**

**11. \*Approved By:**

(print name)

(approval signature)

Date:

Date:


**12. \*Attach a copy of the signature card(s).**

**13. \*Attach any supporting documentation.**

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### Instructions and Information (Item number corresponds with item number on form).

All the information requested above with a \* is required. The questions are designed to generate responses indicating "who, what, why, when, where, and how" regarding the suspicious activity.

1. Complete all the suspect(s) information. If our customer is the "victim" and not a suspect, list the customer in item 8.
2. Check the category that best reflects the activity that is being reported.
3. All account numbers involved in the suspicious activity should be included and the date each were opened.
4. Describe as completely as possible **how** the transaction or pattern of transactions was conducted. Include what was said, anything noted as unusual, any police reports filed, customer losses, or customer actions, etc. List any actions taken by the bank, such as closure of the account. Note where the original source for the funds came from (cash, transit check, cashier's check, title company check, loan advance, another business or related account, etc.) and anything unusual about the money, such as smell, look, and denomination.
5. Include all branch locations **where** activity occurred and any other financial institution involved in the suspicious activity.
6. Describe as fully as possible, **why** the activity or transaction is unusual for the customer. Reasons might be kiting activity, customer changed their mind regarding the cash amount of the transaction to avoid reporting requirements, the money was crisp one hundred dollar bills strapped from another bank, the money was stashed in a back pack with different denominations, the customer always visits the safe deposit box before depositing cash, the customer(s) said they were structuring their activity to avoid reporting, etc. (Please see the listing below regarding different suspicious type activity for help).
  - \* Check fraud, wire fraud, identity theft or other.
  - \* Unusual ACH Activity. Although many of the transactions can be legitimate, it offers ways to move money illegally and anonymously.
  - \* Multiple incoming wire transfers followed by: Outgoing Wires, ACH debits to known MSBs, checks written to cash by the accountholder, checks written to or endorsed by known MSBs, ATM cash withdrawals in remote locations or other countries.
  - \* Unregistered/Unlicensed MSBs.
  - \* Transactions are not the sort in which the particular customer would normally be expected to engage.
  - \* Transactions being conducted in bursts of activities within a short period of time, especially in previously dormant accounts.
  - \* Transactions seemingly designed to, or attempting to avoid reporting and recordkeeping requirements.
  - \* Transactions that are not appropriate with the stated business type and/or that are unusual in comparison with similar businesses.
  - \* Unusual mixed deposits of money orders, third party checks, payroll checks, etc., into a business account.
  - \* Unusual transactions occurring among certain business types (e.g., food importer dealing with an auto parts exporter).
  - \* Unusually complex series of transactions indicative of layering activity involving multiple accounts, banks, parties, jurisdictions.
  - \* Unusually large numbers and/or volumes of wire transfers and/or repetitive wire transfer patterns.
7. State the date range of the suspicious activity. There are times the dates may be the same.
8. Include any other individuals that were involved in some way. If our customer was a victim, then this is where you would list our customer. If you believe that our customer is the suspect, then the customer would be listed in item 1. Explain briefly their involvement in this section.

**\*\* Refer to the Bank Policies and Procedures Manual for additional information.**

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