

***The FinCEN Currency
Transaction Report
&
Designation of Exempt Persons
Report***

Introduction & Filing Instructions





Agenda

➤ Introduction

FinCEN CTR

- The New FinCEN CTR: General Information
- Features and Advantages of the FinCEN CTR
- Filing Instructions: How to File the FinCEN CTR

FinCEN DOEP

- The New FinCEN DOEP: General Information
- Features and Advantages of the FinCEN DOEP
- Filing Instructions: How to File the FinCEN DOEP
- Q&A Session



Introduction

- This webinar is presented by the collaborative efforts of FinCEN's Office of Outreach Resources, Office of Regulatory Policy, and the Office of Compliance.
- The purpose of this webinar is to provide the public with information and guidance regarding the new FinCEN CTR and DOEP.



Introduction

- Beginning April 1, 2013, the new FinCEN reports must be used.
- Legacy versions of reports may not be uploaded into the E-Filing system after March 31, 2013.
- Filers should consider creating new templates.
- The new reports are available through the BSA E-Filing System.
- Reports may not be submitted in paper format.
- The new FinCEN CTR and DOEP may be filed through discrete or batch filing.



Agenda

- Introduction

FinCEN CTR

- **The New FinCEN CTR: General Information**
- Features and Advantages of the FinCEN CTR
- Filing Instructions: How to File the FinCEN CTR

FinCEN DOEP

- The New FinCEN DOEP: General Information
- Features and Advantages of the FinCEN DOEP
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- Q&A Session



The New FinCEN CTR

General Information

- It is a uniform report that can be used across multiple industries to report currency transactions in excess of \$10,000.
- It has new fields to provide law enforcement with additional information and support.
- The report was revised to create ease of flow and to be more user friendly.



Agenda

- Introduction

FinCEN CTR

- The New FinCEN CTR: General Information
- **Features and Advantages of the FinCEN CTR**
- Filing Instructions: How to File the FinCEN CTR

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Features and Advantages of the FinCEN CTR

- The FinCEN CTR features the sequence:
 - Home Tab: Header Page
 - Step 1: Part I – Person/Transactor Information
 - Step 2: Part II – Amount and Type of Transaction
 - Step 3: Part III – Financial Institution Information
- Tabs for each section of the CTR were added to each page of the report for ease of access.

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information



Features and Advantages of the FinCEN CTR

- FinCEN created the new CTR as a uniform report that can be used by any type of financial institution.

*37 Type of financial institution

Casino/Card Club
Depository institution
MSB
Securities/Futures
Other



Features and Advantages of the FinCEN CTR

- The new FinCEN CTR was restructured to promote clarity and be more user friendly.
- FinCEN has clarified and expanded the CTR filing instructions to be user interactive and field specific.
- Users are now able to place their mouse cursor over any active field to access filing instructions that provide detailed information on how to complete the field.

*37 Type of financial institution

Item 37 - Type of financial institution. Identify the type of financial institution recorded in Item 30. If "Other" is selected, enter a brief description of the financial institution in the associated "Other (specify)" text field.



Features and Advantages of the FinCEN CTR

- The FinCEN CTR features the ability to add multiple data elements including but not limited to information about the person involved in transaction, account numbers, and information about where the transaction occurred.





Features and Advantages of the FinCEN CTR

Critical Fields

- Critical fields are those minimally required data fields necessary for the processing of the report by the BSA E-Filing System.
- Critical fields are easily recognizable by their yellow background and asterisk.

Check	<input type="checkbox"/>	If entity	
*4 Individual's last name or entity's legal name	<input type="checkbox"/>	Unknown	
*5 First name	<input type="checkbox"/>	Unknown	



Features and Advantages of the FinCEN CTR

*4 Individual's last name
or entity's legal name

Unknown

*5 First name

Unknown

John

➤ Critical Fields

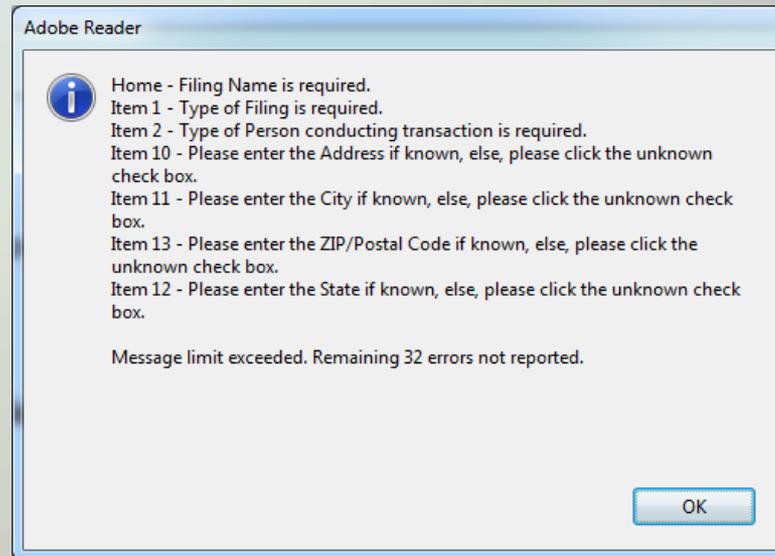
➤ CTR now features an “Unknown” box. Users may not enter responses such as “Unknown,” “Not Applicable,” “N/A,” or “XX” in CTR fields.

➤ The “Unknown” box must be checked when the information is not known or unavailable.

➤ Non-critical fields must be left blank when the information is not known or unavailable.



Features and Advantages of the FinCEN CTR



- Critical Fields
 - The BSA E-Filing System will not accept filings when critical fields are left blank.



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BSA E-FILING SYSTEM

FINANCIAL CRIMES ENFORCEMENT NETWORK

BSA E-Filing Home

New to BSA E-Filing

- Next Steps for Using BSA E-Filing

Alerts

- View Alerts

Documentation

- **Frequently Asked Questions**
- User Manual
- Quick Reference
- Computer Based Training

New Reports

- File Batch FinCEN CTR
- **File FinCEN CTR**
- File Batch FinCEN SAR
- File FinCEN SAR
- File Batch FinCEN DOEP
- File FinCEN DOEP
- File FinCEN RMSB

Legacy Reports

- File Batch CTRC
- File CTR
- File CTR
- File FBAR
- File RMSB
- File Batch SAR

Welcome to the BSA E-Filing System

You are currently logged in as Diego Rosero. Last login: August 30, 2012 at 04:36:10 PM EDT.

The BSA E-Filing System allows you to file BSA forms with FinCEN via a secure Internet connection. BSA E-Filing allows you to receive system alerts and advisories via BSA E-Filing and respond to them by sending secure messages to FinCEN.

To learn how the system works, download and review the BSA E-Filing User Manual, Quick Reference Guide, and/or Supervisory User Manual depending on your role, all three of which are available on the BSA E-Filing Documentation menu to the left. If you have questions that are not resolved by the BSA E-Filing documentation, contact the BSA E-Filing Help Desk at 1-866-346-9478 (option 1) or BSAEFilingHelp@fincen.gov. The Help Desk regular hours of operation are 8:00 am - 6:00 pm East Coast Time, Monday - Friday. Please note that the Help Desk is closed on Federal holidays.



New to BSA E-Filing? Continue Here...

Getting Started



Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

Open a New Form

Click "Open New Form" to open a new form.



Getting Started



- When uploading a previously saved report or utilizing a template, click on “Open Existing Form”

Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

Open a New Form

Click "Open New Form" to open a new form.

Getting Started



- When completing a discrete filing or setting up a template for the first time, select “Open New Form”

Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

Open a New Form

Click "Open New Form" to open a new form.



Currency Transaction Report

Home

Step 1. Person Information

Step 2. Amount and Type of Transaction

Step 3. Financial Institution Information



Currency Transaction Report

OMB No. 1506-0064

Version Number: 1.1

Filing Name

SAMPLE FILE 123



*1 Type of filing

Initial report

Correct/amend prior report

FinCEN directed Backfiling



Document Control Number / BSA Identifier

Filing Instructions: How to File the FinCEN CTR

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Save

Validate

Submit

Print

Sign with PIN



Part I:

Person Involved in Transaction

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Part I Person Involved in Transaction 1 of 2



Filing Instructions:

How to File the FinCEN CTR



Currency Transaction Report

Home

Step 1. Person Information

Step 2. Amount and Type of Transaction

Step 3. Financial Institution Information

Part I Person Involved in Transaction 1 of 1



- *2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)
- 3 Multiple transactions

➤ The new FinCEN CTR allows filer to specify the role of person in the transaction.

Filing Instructions:

How to File the FinCEN CTR



➤ Box 2a is checked when completing Part I for a person who is conducting the transaction on his/her own behalf.

Part I Person Involved in Transaction 1 of 1



- *2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)
- 3 Multiple transactions

Check If entity

*4 Individual's last name or entity's legal name

Unknown

SMITH

*5 First name

Unknown

JOHN

Filing Instructions:

How to File the FinCEN CTR



➤ Box 2b is checked when completing Part I for a person who is conducting the transaction on behalf of someone else.

Part I Person Involved in Transaction 1 of 1



*2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)

3 Multiple transactions

Check If entity

*4 Individual's last name or entity's legal name

Unknown

DOE

*5 First name

Unknown

JANE

Filing Instructions:

How to File the FinCEN CTR



➤ Box 2c is checked when completing Part I for a person on whose behalf the transaction is being conducted.

Part I Person Involved in Transaction 1 of 1



*2 a Person conducting transaction on own behalf b Person conducting transaction for another **c** Person on whose behalf transaction was conducted d Courier Service (private)

3 Multiple transactions

Check If entity

*4 Individual's last name or entity's legal name Unknown

*5 First name Unknown

Filing Instructions:

How to File the FinCEN CTR



➤ Box 2d is checked when the conductor of the transaction is a courier service contracted by the person on whose behalf the transaction takes place, and not by the financial institution.

Part I Person Involved in Transaction 1 of 1



*2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)

3 Multiple transactions

Check If entity

*4 Individual's last name or entity's legal name

Unknown

DOE

*5 First name

Unknown

JASON

Filing Instructions:

How to File the FinCEN CTR



➤ Multiple Transactions (Item 3) is used when reporting multiple transactions (regardless of the amount) that were conducted by or for the person recorded in Part I during a single business day.

Part I Person Involved in Transaction 1 of 1



*2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)

3 Multiple transactions

Check If entity

*4 Individual's last name or entity's legal name Unknown

DOE

*5 First name Unknown

JASON

Filing Instructions:

How to File the FinCEN CTR



Person involved in the transaction information is recorded in this section. If information is unknown or unavailable check the “Unknown” box for the appropriate critical field.

Part I Person Involved in Transaction 1 of 1



*2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service

3 Multiple transactions

Check If entity

*4 Individual's last name or entity's legal name Unknown

*5 First name Unknown **MARIA**

6 Middle name

Suffix

Filing Instructions:

How to File the FinCEN CTR



The FinCEN CTR features two new fields in Part I:

- Gender (Item 7)
- NAICS Code (Item 9a)

7 Gender

Female

8 Alternate Name

9 Occupation or type of business

9a NAICS Code

Accommodation (721)

Accounting, Tax Preparation, Bookkeeping, and Payroll Services (5412)

Activities Related to Credit Intermediation (5223)

Activities Related to Real Estate (5313)

Administration of Economic Programs (926)

Administration of Environmental Quality Programs (924)

Administration of Housing Programs, Urban Planning, and Community Development (925)

Administration of Human Resource Programs (923)

Filing Instructions:

How to File the FinCEN CTR



Form of identification used to verify identity:

- Filers are able to record foreign identifications.
- Filers may use the “Other” box to record distinct types of identifications other than those already listed.

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other

Number Country Issuing State

Filing Instructions:

How to File the FinCEN CTR



- Item 21 is where the filer records the Cash In amount and any accounts involved for the person recorded in Part I.
- Item 22 is where the filer records the Cash Out amount and any accounts involved for the person recorded in Part I.

21 Cash in amount for individual or entity listed in Item 4 \$

Account number



Account number



22 Cash out amount for individual or entity listed in Item 4 \$

Account number





Part II:

Amount and Type of the Transaction(s)

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Part II Amount and Type of Transaction(s). Check all boxes that apply.

Filing Instructions:

How to File the FinCEN CTR



➤ In Item 24, check “Armored car (FI contract)” if a reported transaction involved a pick-up or delivery of currency by an armored car service under contract to the financial institution listed in Part III (do not check this box if the armored car service was under contract to a person recorded in Part I).

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23 Date of transaction

24

Armored car (FI Contract)

ATM

Mail Deposit or Shipment

Night Deposit

Aggregated transactions

Filing Instructions:

How to File the FinCEN CTR



- In Item 24, check “ATM” if a reported transaction occurred at an automated teller machine (ATM).

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23 Date of transaction

24 Armored car (FI Contract) ATM Mail Deposit or Shipment Night Deposit Aggregated transactions

Filing Instructions:

How to File the FinCEN CTR



- In Item 24, check “Mail Deposit or Shipment” if a reported transaction was made by mail deposit or shipment.

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23 Date of transaction

24

Armored car (FI Contract)

ATM

Mail Deposit or Shipment

Night Deposit

Aggregated transactions

Filing Instructions:

How to File the FinCEN CTR



- In Item 24, check “Night Deposit” if a reported transaction involved a night deposit of cash.

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23 Date of transaction

24

Armored car (FI Contract)

ATM

Mail Deposit or Shipment

Night Deposit

Aggregated transactions

Filing Instructions:

How to File the FinCEN CTR



- In Item 24, check “Aggregated transactions” if the financial institution did not identify any of the transactors because the CTR reports aggregated transactions each of which was below the reporting requirement.
- The option “Aggregated transactions” is not the same as Item 3 “Multiple transactions,” which can involve transactions that are above the reporting requirement.

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23 Date of transaction

24 Armored car (FI Contract) ATM Mail Deposit or Shipment Night Deposit Aggregated transactions

Filing Instructions:

How to File the FinCEN CTR



➤ Item 25 (Cash In) is where the filer would record the Cash In amount(s) for the currency transaction(s) that took place.

➤ Filers may aggregate same type of Cash In transactions in this section.

➤ Total Cash In line will be auto-populated based on the amounts entered in Items 25a – 25z.

*25 CASH IN: (in U.S. dollar equivalent)	
a Deposit(s)	\$ <u>5,000.00</u>
b Payment(s)	<u>8,000.00</u>
c Currency received for funds transfer(s) out	<u>.00</u>
d Purchase of negotiable instrument (s)	<u>.00</u>
e Currency exchange(s)	<u>.00</u>
f Currency to prepaid access	<u>.00</u>
g Purchases of casinos chips, tokens and other gaming instruments	<u>.00</u>
h Currency wager(s) including money plays	<u>.00</u>
i Bills inserted into gaming devices	<u>.00</u>
z Other (specify):	<u>.00</u>
Total Cash in	\$ <u>13,000.00</u>

Filing Instructions:

How to File the FinCEN CTR



➤ Item 27 (Cash Out) is where the filer would record the Cash Out amount(s) for the currency transaction(s) that took place.

➤ Filers may aggregate same type of Cash Out transactions in this section.

➤ Total Cash Out line will be auto-populated based on the amounts entered in Items 27a – 27z.

*27 CASH OUT: (in U.S. dollar equivalent)	
a	Withdrawal(s) \$ <u>4,000.00</u>
b	Advance(s) on credit (including markers) <u>.00</u>
c	Currency paid from funds transfer(s) in <u>2,500.00</u>
d	Negotiable instrument(s) cashed <u>5,000.00</u>
e	Currency exchange(s) <u>.00</u>
f	Currency from prepaid access <u>.00</u>
g	Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments <u>.00</u>
h	Payment(s) on wager(s) (including race and OTB or sports pool) <u>.00</u>
i	Travel and complimentary expenses and book gaming incentives <u>.00</u>
j	Payment for tournament, contest or other promotions <u>.00</u>
z	Other (specify): <u>.00</u>
Total Cash out \$ <u>11,500.00</u>	

Filing Instructions:

How to File the FinCEN CTR



- Items 26 (Foreign Cash in) and 28 (Foreign Cash out) is where a filer would record, **in the foreign currency**, the amount of currency received or disbursed by the financial institution and record the country that issued the currency.
- Do not enter amounts in U.S. dollars.

26 Foreign Cash in	<input type="text" value="18,500"/>	Foreign Country	<input type="text" value="BE"/>
26 Foreign Cash in	<input type="text" value="15,200"/>	Foreign Country	<input type="text" value="Canada"/>
28 Foreign Cash out	<input type="text"/>	Foreign Country	<input type="text" value="Canada"/>

The screenshot shows a software interface for filing a FinCEN CTR. It features three rows of input fields. The first row shows '26 Foreign Cash in' with a value of '18,500' and 'Foreign Country' set to 'BE'. The second row shows '26 Foreign Cash in' with a value of '15,200' and 'Foreign Country' set to 'Canada'. The third row shows '28 Foreign Cash out' with an empty field and 'Foreign Country' set to 'Canada'. A dropdown menu is open for the 'Foreign Country' field in the third row, displaying a list of countries including Canada, Cambodia, Cameroon, Cape Verde, Cayman Islands, Central African Republic, Chad, Chile, and China. The 'Canada' option is currently selected and highlighted in blue.



Part III:

Financial Institution Where Transaction(s) Takes Place

Currency Transaction Report

Home

Step 1. Person
Information

Step 2. Amount and Type of
Transaction

Step 3. Financial Institution
Information

Part III Financial Institution Where Transaction(s) Takes Place 1 of 1



Filing Instructions:

How to File the FinCEN CTR



- The new FinCEN CTR allows filers to add additional Part III sections to record the information about multiple financial institutions where related reportable transactions occurred.

Part III Financial Institution Where Transaction(s) Takes Place 2 of 2 + -

*37 Type of financial institution

Other (specify)

*29 Primary federal regulator

Filing Instructions:

How to File the FinCEN CTR



- The new CTR allows different type of financial institutions to use the same uniform report.

Currency Transaction Report

Home Step 1. Person Information Step 2. Amount and Type of Transaction Step 3. Financial Institution Information

Part III Financial Institution Where Transaction(s) Takes Place 1 of 2 + -

*37 Type of financial institution

Other (specify)

*29 Primary federal regulator

38 If 37a - Casino/Card Club is checked, indicate type (check only one)

State licensed casino Tribal authorized casino Card club Other

*30 Legal name of financial institution

Filing Instructions:

How to File the FinCEN CTR



- Once the type of financial institution is selected in Item 37, then the filer will be able to select the corresponding primary federal regulator in Item 29 for said financial institution.

Part III Financial Institution Where Transaction(s) Takes Place 1 of 2

*37 Type of financial institution

Depository institution

Other (specify)

*29 Primary federal regulator

Federal Reserve Board (FRB)
Federal Deposit Insurance Corporation (FDIC)
Internal Revenue Service (IRS)
National Credit Union Administration (NCUA)
Office of the Comptroller of the Currency (OCC)

Filing Instructions:

How to File the FinCEN CTR



➤ If in Item 37 “Casino/Card Club” is selected, Item 38 will become a critical field and the financial institution would then specify the type of gaming institution where the reported transaction(s) took place.

Part III Financial Institution Where Transaction(s) Takes Place 1 of 2



*37 Type of financial institution

Other (specify)

*29 Primary federal regulator

38 If 37a - Casino/Card Club is checked, indicate type (check only one)

State licensed casino Tribal authorized casino Card club Other

Filing Instructions:

How to File the FinCEN CTR



*30 Legal name of financial institution

ABC BANK NATIONAL ASSOCIATION

31 Alternate name, e.g. trade name, DBA

*32 EIN

55555558

*33 Address

123 MAIN STREET

*34 City

WASHINGTON

*35 State

DC

*36 ZIP Code

30005

39 Financial institution ID type

ID number

Central Registration Depository (CRD) number
Investment Adviser Registration Depository (IARD) number
National Futures Association (NFA) number
Research, Statistics, Supervision and Discount (RSSD) number
Securities and Exchange Commission (SEC) number



Financial Institution Identification

➤ The options listed in Item 39 are described as follows:

➤ **Central Registration Depository (CRD) number:** Is the central licensing and registration system for the U.S. securities industry and its regulators (used by FINRA and other securities regulatory bodies).

➤ **Investment Adviser Registration Depository (IARD) number:** The IARD and its system collect and maintain the registration, reporting and disclosure information for Investment Advisers and their associated persons.

➤ **National Futures Association (NFA) number:** The NFA is the industry-wide, self-regulatory organization for the U.S. futures industry.



Financial Institution Identification

➤ The options listed in Item 39 are described as follows:

➤ **Research, Statistics, Supervision and Discount (RSSD) number:**

The National Information Center (NIC) is a central repository of data about banks and other institutions for which the Federal Reserve has a supervisory, regulatory, or research interest, including both domestic and foreign banking organizations operating in the United States. The RSSD is a unique identifying number assigned by the Federal Reserve for all financial institutions, main offices, as well as branches.

➤ If “RSSD” is selected, but the identifying number is unknown, the information can be accessed at the Federal Financial Institutions Examination Council (FFIEC) Web Site at

<http://www.ffiec.gov/find/callreportsub.htm>.



Financial Institution Identification

➤ The options listed in Item 39 are described as follows:

➤ **Securities and Exchange Commission (SEC) number:** Issued to individuals and entities registered with the Securities and Exchange Commission.

Filing Instructions:

How to File the FinCEN CTR



- The filing institution contact office and phone number are required fields.
- The Contact Office field (Item 40) is used to input the name of the filing institution's contact office from where additional information can be obtained.
- Item 42 (Date Filed) will be auto-populated when the report is digitally signed.

*40 Contact office

COMPLIANCE

*41 Phone number

Ext.

*42 Date Filed

(Date filed will be auto-populated when the form is signed.)

The FinCEN Designation of Exempt Persons Report

Introduction & Filing Instructions





Agenda

➤ Introduction

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FinCEN DOEP

- **The New FinCEN DOEP: General Information**
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- Q&A Session



The New FinCEN DOEP

General Information

- Beginning April 1, 2013, the new FinCEN reports must be used.
- Legacy versions of reports may not be uploaded into the E-Filing system after March 31, 2013.
- Filers should consider creating new templates.
- Only available through the BSA E-Filing System.
- It has new fields to provide law enforcement with additional information and support.
- The report was revised to create ease of flow and to be more user friendly.



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FinCEN DOEP

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- **Features and Advantages of the FinCEN DOEP**
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- Q&A Session



Features and Advantages of the FinCEN DOEP

- The new FinCEN DOEP was restructured to promote clarity and be more user friendly.
- FinCEN has clarified and expanded the DOEP filing instructions to be user interactive and field specific.
- A user is now able to place their mouse cursor over any field for the filing instructions to become visible and provide detailed information on how to complete the field.

*3 Individual's last name or entity's legal name of the exempt person

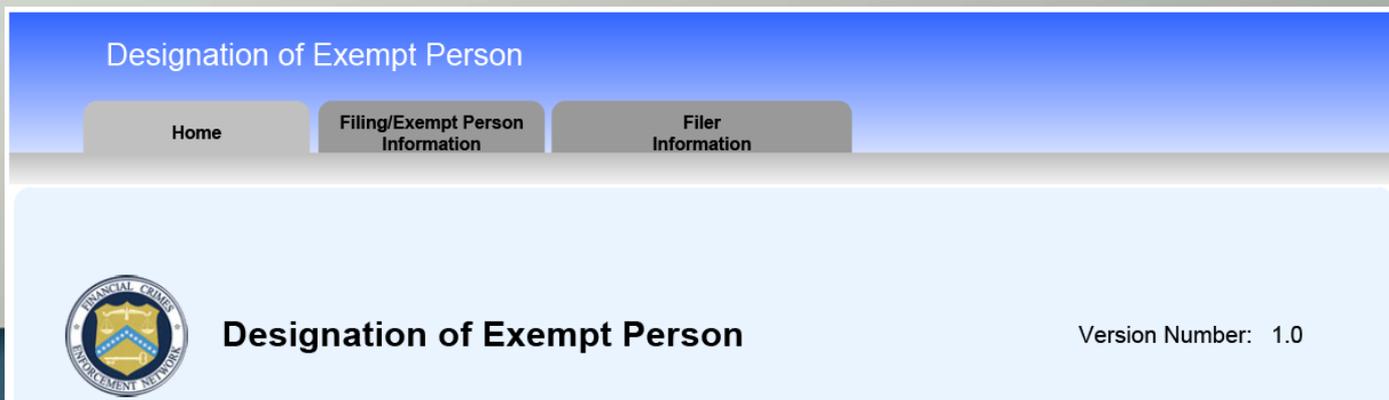


Item 3 - Individual's last name or entity's legal name of the exempt person. Enter the full legal name of the exempt person as it is shown on the charter or other document creating the entity. For exempt persons that are a sole proprietorship, enter the last name, first name and middle initial of the proprietor in item 3, 4, and 5.



Features and Advantages of the FinCEN DOEP

- Tabs for each section of the DOEP were added to each page of the report for ease of access.
- The FinCEN DOEP section sequence:
 - Home Tab: Header Page
 - Tab I: Filing Type/Person Information
 - Tab II: Filer Information





Features and Advantages of the FinCEN DOEP

➤ The FinCEN DOEP was updated to reflect change in guidance and filing instructions.

Part I Filing Information

*1 Indicate the type of Filing by checking a,b or c

a Initial designation

b Exemption amended

c Exemption revoked

*16 Type of exempt person, check box a, b, c, or d

a Listed company

b Listed company subsidiary

c Eligible non-listed business

d Payroll customer



Features and Advantages of the FinCEN DOEP

Critical Fields

- Critical fields are those minimally required data fields necessary for the processing of the report by the BSA E-Filing System.
- Critical fields are easily recognizable by their yellow background and asterisk.

Part II Exempt Person Information

Check here If entity

*3 Individual's last name or entity's legal name of the exempt person

4 First name

5 Middle name



Features and Advantages of the FinCEN DOEP



- Critical Fields
 - The BSA E-Filing System will not accept filings when critical fields are left blank.



Agenda

➤ Introduction

FinCEN CTR

- The New FinCEN CTR: General Information
- Features and Advantages of the FinCEN CTR
- Filing Instructions: How to File the FinCEN CTR

FinCEN DOEP

- The New FinCEN DOEP: General Information
- Features and Advantages of the FinCEN DOEP
- **Filing Instructions: How to File the FinCEN DOEP**
- Q&A Session



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- File Batch CTR
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Welcome to the BSA E-Filing System

You are currently logged in as Diego Rosero. Last login: August 30, 2012 at 04:36:10 PM EDT.

The BSA E-Filing System allows you to file BSA forms with FinCEN via a secure Internet connection. BSA E-Filing allows you to receive system alerts and advisories via BSA E-Filing and respond to them by sending secure messages to FinCEN.

To learn how the system works, download and review the BSA E-Filing User Manual, Quick Reference Guide, and/or Supervisory User Manual depending on your role, all three of which are available on the BSA E-Filing Documentation menu to the left. If you have questions that are not resolved by the BSA E-Filing documentation, contact the BSA E-Filing Help Desk at 1-866-346-9478 (option 1) or BSAEFilingHelp@fincen.gov. The Help Desk regular hours of operation are 8:00 am - 6:00 pm East Coast Time, Monday - Friday. Please note that the Help Desk is closed on Federal holidays.



Getting Started



Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

Open a New Form

Click "Open New Form" to open a new form.

Getting Started



- When uploading a previously saved report or utilizing a template, click on “Open Existing Form”

Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

←

Open a New Form

Click "Open New Form" to open a new form.

Getting Started



- When completing a discrete filing or setting up a template for the first time, select “Open New Form”

Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

Open a New Form

Click "Open New Form" to open a new form.



Designation of Exempt Person

Home

Filing/Exempt Person
Information

Filer
Information



Designation of Exempt Person

Version Number: 1.0

Filing Name

SAMPLE FILE 123



Save

Validate

Submit

Print

Sign with PIN



Tab II:

Filing Information & Exempt Person Information

Designation of Exempt Person

Home

Filing/Exempt Person
Information

Filer
Information



Filing Instructions:

How to File the FinCEN DOEP

Part I

➤ Indicate the type of Filing

Part I Filing Information

*1 Indicate the type of Filing by checking a,b or c

a Initial designation

b Exemption amended

c Exemption revoked

➤ Boxes 1b and 1c

Part I Filing Information

*1 Indicate the type of Filing by checking a,b or c

a Initial designation

b Exemption amended

c Exemption revoked

Document Control Number / BSA Identifier

00000000000000

*2 Effective date of the exemption

07/02/2012



Filing Instructions:

How to File the FinCEN DOEP

Part II

- Record the Exempt Person Information in this section.
- Always complete critical fields.

Part II Exempt Person Information

Check here If entity

*3 Individual's last name or entity's legal name of the exempt person

ABC COMPANY

4 First name

5 Middle name

Suffix

6 Alternate Name

JOHN'S STORE



Filing Instructions:

How to File the FinCEN DOEP

Part II

➤ Type of Exempt Person field (Item 16) was updated to reflect current guidance.

*16 Type of exempt person, check box a, b, c, or d

a Listed company

b Listed company subsidiary

c Eligible non-listed business

d Payroll customer



Filing Instructions:

How to File the FinCEN DOEP

Part II

Check box a, Listed Company, if the entity listed on one of the major national stock exchanges, such as the New York Stock Exchange, the NASDAQ, or the American Stock Exchange.

*16 Type of exempt person, check box a, b, c, or d

a Listed company

b Listed company subsidiary

c Eligible non-listed business

d Payroll customer



Filing Instructions:

How to File the FinCEN DOEP

Part II

Check box b, if the entity is a subsidiary (at least 51% owned) of a listed company.

*16 Type of exempt person, check box a, b, c, or d

a Listed company

b Listed company subsidiary

c Eligible non-listed business

d Payroll customer



Filing Instructions:

How to File the FinCEN DOEP

Part II

Check box c if the entity is an eligible non-listed business. Eligible non-listed businesses are those that maintain a deposit account for two months (or less if, after a risk based analysis, the financial institution is able to form a reasonable belief that the customer has a legitimate business purpose for conducting frequent or regular large currency transactions) and conducts five or more reportable transactions within a year. Non-listed businesses may not derive more than 50% of gross revenues from ineligible activity.

*16 Type of exempt person, check box a, b, c, or d

- | | | | | | |
|---|-------------------------------------|------------------------------|---|--------------------------|---------------------------|
| a | <input type="checkbox"/> | Listed company | b | <input type="checkbox"/> | Listed company subsidiary |
| c | <input checked="" type="checkbox"/> | Eligible non-listed business | d | <input type="checkbox"/> | Payroll customer |



Filing Instructions:

How to File the FinCEN DOEP

Part II

Check box d if the entity being exempted is a payroll customer. Payroll customers must maintain a deposit account for two months (or less if, after a risk based analysis, the financial institution is able to form a reasonable belief that the customer has a legitimate business purpose for conducting frequent or regular large currency transactions), conduct five or more reportable transactions within a year, and be incorporated or organized under the laws of the U.S., or a State, or is registered as and eligible to do business within the U.S. or a State.

*16 Type of exempt person, check box a, b, c, or d

a Listed company

b Listed company subsidiary

c Eligible non-listed business

d Payroll customer



Filing Instructions:

How to File the FinCEN DOEP

Part II

- The FinCEN DOEP features a new field useful to law enforcement, the NAICS Code field (Item 7a).
- If none of the NAICS codes apply, leave Item 7a blank and complete Item 7.

7 Occupation or type of business

CARPENTER

7a NAICS Code

Accommodation (721)
Accounting, Tax Preparation, Bookkeeping, and Payroll Services (5412)
Activities Related to Credit Intermediation (5223)
Activities Related to Real Estate (5313)
Administration of Economic Programs (926)
Administration of Environmental Quality Programs (924)
Administration of Housing Programs, Urban Planning, and Community Development (925)
Administration of Human Resource Programs (923)



Tab III: Filer Information

Designation of Exempt Person

Home

Filing/Exempt Person
Information

Filer
Information



Filing Instructions:

How to File the FinCEN DOEP

Part III

➤ In this section of the DOEP, banks would enter their identifying information as well as their corresponding federal regulator from the drop down menu in Item 24.

Part III Filer Information			
*17 Name of bank	ABC BANK		
*18 EIN	555555558	19 RSSD	12345
*20 Address	123 MAIN STREET		
*21 City	WASHINGTON		
*22 State	DC	*23 ZIP Code	20005
*24 Bank's primary federal regulator	Federal Reserve Board (FRB)		
	Federal Reserve Board (FRB)		
	Federal Deposit Insurance Corporation (FDIC)		
	Internal Revenue Service (IRS)		
	National Credit Union Administration (NCUA)		
	Office of the Controller of the Currency (OCC)		



Filing Instructions:

How to File the FinCEN DOEP

Part III

➤ Item 25 would be selected if the designation of exemption is being made for one or more affiliated banks.

25 If this designation is also being made for one or more affiliated banks, check this box

Affiliated Bank Information 1 of 2



*17 Name of bank

*18 EIN

19 RSSD

*20 Address

*21 City

*22 State

*23 ZIP Code

*24 Bank's primary federal regulator



Filing Instructions: *How to File the FinCEN DOEP*

Part IV

Part IV Signature

I am authorized to sign this form on behalf of the bank granting the exemption and any listed bank subsidiaries. I declare that the information provided is true, correct and complete.

26 Print name

JOHN SMITH

27 Title

COMPLIANCE OFFICER

28 Signature

Please return to the Home tab to sign with PIN.

[Back to Home](#)

29 Phone number (include area code)

5555555555

29a Extension

123

30 Date of Signature

(Date of signature will be auto-populated when the form is signed.)



Agenda

➤ Introduction

FinCEN CTR

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FinCEN DOEP

- The New FinCEN DOEP: General Information
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➤ **Q&A Session**

Frequently Asked Questions



Q: Are items without an asterisk required to be completed?

A: Items with an asterisk, or items with yellow shading, are critical fields that the filer is required to complete. If an item does not have an asterisk, it is not a critical field. However, financial institutions should file all FinCEN reports with complete and accurate information. As previously noted, if the information is unknown for a critical field, the filer must check the associated “unknown” box or the report cannot be submitted to FinCEN.

Frequently Asked Questions



Q: Where can I find the Technical Specifications and line item Filing Instructions for the new FinCEN CTR?

A: Technical Specifications and line item Filing Instructions may be found in Attachment C located at: <http://bsaefiling.fincen.treas.gov/news/FinCENCTRElectronicFilingRequirements.pdf>

Frequently Asked Questions



Q: How do I use the NAICS code field (Item 9a) in the FinCEN CTR?

A: Select the option that best identifies the occupation or type of business entered in Item 9. Filers can access the FinCEN approved list of NAICS codes from the drop down menu in the FinCEN CTR. If no selection from the NAICS code list is appropriate, use a specific descriptive word or phrase, such as “Carpenter” or “Retired Carpenter” in the Occupation field, and leave the NAICS code field blank. Remember that simply entering “Retired” is not an adequate entry in this field.

Frequently Asked Questions



Q: Can I access copies of previously filed reports through the BSA E-Filing System?

A: The BSA E-Filing System is not a record keeping program; consequently, filers are not able to access or view previously filed reports. The BSA E-Filing system does, however, provide tracking information on past report submissions.

Frequently Asked Questions



Q: In the FinCEN CTR, when would I use the “Multiple Transactions” box and the “Aggregated Transactions” box?

A: Multiple Transactions (Item 3) is used when reporting multiple transactions (regardless of the amount) that were conducted by or for the person recorded in Part I during a single business day.

➤ In Item 24, check “Aggregated transactions” if the financial institution did not identify any of the transactors because the CTR reports aggregated transactions each of which was below the reporting requirement.

Frequently Asked Questions



Q: In the FinCEN CTR, when would I use the “Multiple Transactions” box and the “Aggregated Transactions” box?

Scenario I:

Person A conducts several related deposits throughout a single business day, that total over \$10,000, into one account and the financial institution obtained identifying information on Person A.

If the account, where the funds were deposited, belonged to Person A, then the financial institution would complete a Part I on Person A and select box 2a (Person conducting transaction on own behalf) and Item 3 (Multiple Transactions).

If the account, where the funds were deposited, belonged to someone else other than Person A, then the financial institution would complete a Part I on Person A and select box 2b (Person conducting transaction for another) and Item 3 (Multiple Transactions); additionally, the financial institution would complete a Part I on the owner of the account where the funds were deposited and select box 2c (person on whose behalf transaction was conducted) and Item 3 (Multiple Transactions).

Frequently Asked Questions



Q: In the FinCEN CTR, when would I use the “Multiple Transactions” box and the “Aggregated Transactions” box?

Scenario II:

A bank receives two night deposits (each transaction below the reporting threshold) that totaled over \$10,000 that are to be deposited into one business account.

The financial institution would file a CTR by completing a Part I on the entity to which the account, where the funds being deposited, belongs by selecting Item 2c (Person on whose behalf transaction was conducted) and Item 3 (Multiple Transactions). Additionally, the financial institution would select “Night Deposit” in Item 24 as no identifying information on the transactor was collected; “Aggregated Transactions” would not be selected in this scenario as none of the deposits was a teller transaction.

Frequently Asked Questions



Q: In the FinCEN CTR, when would I use the “Multiple Transactions” box and the “Aggregated Transactions” box?

Scenario III:

Multiple individuals deposit \$13,000 each into one business account throughout one business day.

The financial institution would file a single CTR by completing a Part I on the entity to which the account, where the funds being deposited, belongs by selecting Item 2c (Person on whose behalf transaction was conducted) and Item 3 (Multiple Transactions). The financial institution would also complete a Part I for each of the transactors by selecting Item 2b (Person conducting transaction for another) and documenting the amounts deposited by each of the transactors in Item 21 (Cash In) of their corresponding Part I's.

Frequently Asked Questions



Q: What amount would I enter in Item 21 (Cash in amount for individual or entity listed in Item 4) when Person A deposits \$6,000 into their own personal account, and later in the same business day, Person B deposits \$5,000 into Person A's personal account?

When completing Part I on Person A, the financial institution would select Item 2a "Person conducting transaction on own behalf" and the amount entered in Item 21 would be \$11,000. In completing a second Part I on Person B, the financial institution would select Item 2b "Person conducting transaction for another" and the amount entered in Item 21 would be \$5,000.

Frequently Asked Questions



Q: How do I complete a FinCEN CTR when an armored car service is involved in the transaction?

Scenario: An armored car delivers \$15,000 to be deposited into Customer A's account (Customer A is a business).

If the armored car is contracted by Customer A (a business) to transport said funds to the financial institution, then Item 2d (Courier Service (private)) would be selected and the armored car service driver information would be recorded in Part I. Additionally, the financial institution will also complete a Part I on Customer A as it is the person on whose behalf the transaction was conducted (select Item 2c).

If the armored car service is contracted by the financial institution to transport said funds, then Item 24 "Armored car (FI Contract)" will be selected, and a Part I on Customer A would be completed (select Item 2c) as it is the person on whose behalf the transaction was conducted.

Frequently Asked Questions



Q: How do I complete a FinCEN CTR when the person on whose behalf the transaction is conducted is a sole proprietorship?

Scenario:

Customer A withdraws \$15,000 in cash from an account that belongs to Customer A's sole proprietorship.

The financial institution would file a CTR and complete a Part I on Customer A by selecting Item 2a (Person conducting transaction on own behalf). The last and first name of the sole proprietor would be entered in Items 4 and 5, respectively, and include the sole proprietorship's DBA name in Item 8 "Alternate Name Field" if applicable. Only one Part I would need to be filled out in this scenario as Customer A is a sole proprietorship and consistent with the definition of "person" in the Bank Secrecy Act's implementing regulations, a sole proprietorship is not a separate legal person from its individual owner. Thus, the financial institution is required to complete the remainder of Part I, by entering the owner's social security number ("SSN"), home address, date of birth, and occupation. Only one Part I is required, even if the business operations have a different address and/or tax identification number ("TIN") than its owner.

Frequently Asked Questions



Q: How do I complete a FinCEN CTR when the funds are being deposited or withdrawn from a joint account?

Scenario:

Person 1 deposits \$15,000 in an account jointly owned by Customer A and Customer B.

The financial institution would file a CTR and complete a Part I for Person 1 (the transactor) by selecting Item 2b "Person conducting transaction for another" and a Part I for each, Customer A and Customer B, by selecting Item 2c "Person on whose behalf transaction was conducted".

For More Information



The BSA Regulatory Helpline

1-800-949-2732

BSA_Resource_Center@fincen.gov

BSA E-Filing Help Desk

1-866-346-9478

BSAEFilingHelp@fincen.gov