

Member BSA Training



As of March 2025



Agenda

All information shared in this presentation is based on BSA rules and regulations from the Federal Financial Institutions Examination Council (FFIEC) and Financial Crimes Enforcement Network (FinCEN), not Nizari Progressive FCU's Policies or Procedures. The presentation is solely for informational purposes and should not be considered as a form of legal advice.



HISTORY & OVERVIEW OF THE BANK SECRECY ACT



CREDIT UNION COMPLIANCE REQUIREMENTS



REPORTING REQUIREMENTS



ADDITIONAL RESOURCES

Bank Secrecy Act (BSA) 1970 History & Overview:



BSA was established for recordkeeping and reporting by private individuals, credit unions, and other financial institutions.

It was generally designed to help identify the source, volume, and movement of currency and other monetary instruments transported or transmitted into or out of the U.S. or deposited in financial institutions.

Requires Credit Unions to comply with the BSA Statutes codified at 12 U.S.C. 1829b, 12 U.S.C. 1951-1960, 31 U.S.C. 5311-5314, and 5316-5336.

<https://www.fincen.gov/resources/statutes-and-regulations/bank-secrecy-act>

Bank Secrecy Act (BSA) 1970 History & Overview:



Requires Credit Union to:

Report Cash over \$10k using the Current Transaction Report. Report any Suspicious Activity. Properly identify persons conducting transactions; and maintain a paper trail by keeping appropriate records of financial transactions.

Seven
Additional Acts
were
introduced
over the next
35 years under
the BSA
Umbrella:

1980s

- Money Laundering Control Act 1986
- Anti-Drug Abuse Act 1988

1990s

- Annunzio-Wylie Anti-Money Laundering Act 1992
- Money Laundering Suppression Act 1994
- Money Laundering and Financial Crimes Strategy Act 1998

2000s

- USA Patriot Act 2001
- Intelligence Reform & Terrorism Prevention Act 2004



Compliance Requirements



BSA compliance internal controls are required by the Credit Union follows:

- Identify Credit Union operations more vulnerable to abuse by money launderers and criminals
- Inform the board of directors, or another committee, and senior management, of compliance initiatives, identified compliance deficiencies, corrective actions taken, and SARs filed.
- Identify the individual responsible for BSA compliance
- Provide for program continuity despite changes in management or employee turnover or structure
- Meet all regulatory recordkeeping and reporting requirements
- Implement a risk-based member due diligence policies, procedures, and processes
- Identify all reportable transactions and accurately file all required reports (CTRs, SARs, etc.)

Reporting Requirements



- Filing Currency Transaction Reports (CTRs):
 - The deadline to file is 15 days after the transaction date.
- Filing Suspicious Activity Reports (SARs):
 - The deadline to file is 30 days after the date of suspicious activity is determined.

Failure to file within the required timeline could result in monetary penalties imposed by FinCEN.

Filing a CTR



- CTRs are required to be filed within 15 days of the transaction date
- CTR filing must be done electronically with FinCEN
- Failure to file electronically will result in monetary penalties imposed by FinCEN
- Recordkeeping:
 - CTRs must be retained either in hard copy or electronic form for five years from the date of the report (not the transaction)
 - The FinCEN website is NOT a recordkeeping system.
 - MSBs are responsible for maintaining their own CTR records. Filed CTRs cannot be retrieved from the website once submitted.

Filing a CTR



- Electronic filing instructions can be found in Attachment C of the “FinCEN CTR Electronic Filing Requirements” document. This document can be found under “User Quick Links” of the BSA E-Filing System homepage (<http://bsaefiling.fincen.treas.gov/main.html>) or on the “Forms” page of the FinCEN Web site (http://www.fincen.gov/forms/bsa_forms/).
- Additionally, instructions are embedded within the discrete filing version of the FinCEN CTR and are revealed when scrolling over the relevant fields with your computer “mouse.”

Filing a CTR



- Transactions totals are aggregated for the same business day. Cash-in vs. Cash-out transactions.
- Frequently asked questions on how to complete a CTR can be found at:
 - <https://www.fincen.gov/frequently-asked-questions-regarding-fincen-currency-transaction-report-ctr>

Example Pamphlet for CTRs



Notice to Customers: A CTR Reference Guide

Why is my financial institution asking me for identification and personal information?

Federal law requires financial institutions to report currency (cash or coin) transactions over \$10,000 conducted by, or on behalf of, one person, as well as multiple currency transactions that aggregate to be over \$10,000 in a single day. These transactions are reported on Currency Transaction Reports (CTRs). The federal law requiring these reports was passed to safeguard the financial industry from threats posed by money laundering and other financial crime. To comply with this law, financial institutions must obtain personal identification information about the individual conducting the transaction such as a Social Security number as well as a driver's license or other government issued document. This requirement applies whether the individual conducting the transaction has an account relationship with the institution or not.

There is no general prohibition against handling large amounts of currency and the filing of a CTR is required regardless of the reasons for the currency transaction. The financial institution collects this information in a manner consistent with a customer's right to financial privacy.

Handout provided by Nizari Progressive Federal Credit Union

Example Pamphlet for CTRs



Can I break up my currency transactions into multiple, smaller amounts to avoid being reported to the government?

No. This is called "structuring." Federal law makes it a crime to break up transactions into smaller amounts for the purpose of evading the CTR reporting requirement and this may lead to a required disclosure from the financial institution to the government. Structuring transactions to prevent a CTR from being reported can result in imprisonment for not more than five years and/or a fine of up to \$250,000. If structuring involves more than \$100,000 in a twelve month period or is performed while violating another law of the United States, the penalty is doubled.



Example Pamphlet for CTRs



The following scenarios are examples of structuring.

Examples of Structured Transactions

1. John has \$15,000 in cash he obtained from selling his truck. John knows that if he deposits \$15,000 in cash, his financial institution will be required to file a CTR. John instead deposits \$7,500 in cash in the morning with one financial institution employee and comes back to the financial institution later in the day to another employee to deposit the remaining \$7,500, hoping to evade the CTR reporting requirement.
2. Jane needs \$18,000 in cash to pay for supplies for her wood-carving business. Jane cashes a \$9,000 personal check at a financial institution on a Monday, then cashes another \$9,000 personal check at the financial institution the following day. Jane cashed the checks separately and structured the transactions in an attempt to evade the CTR reporting requirement.

Example Pamphlet for CTRs



3. A married couple, John and Jane, sell a vehicle for \$15,000 in cash. To evade the CTR reporting requirement, John and Jane structure their transactions using different accounts. John deposits \$8,000 of that money into his and Jane's joint account in the morning. Later that day, Jane deposits \$1,500 into the joint account, and then \$5,500 into her sister's account, which is later transferred to John and Jane's joint account.
4. Bob wants to place \$24,000 cash he earned from his illegal activities into the financial system by using a wire transfer. Bob knows his financial institution will file a CTR if he purchases a wire with over \$10,000 currency in one day. To evade the CTR reporting requirement, Bob wires the \$24,000 by purchasing wires with currency in \$6,000 increments over a short period of time, occasionally skipping days in an attempt to prevent the financial institution from filing a CTR.



For further assistance, please contact
FinCEN's Resource Center at 1-800-767-2825

Handout provided by Nizari Progressive Federal Credit Union

Additional Example CTR Scenario



Blake Atkins came in with \$10,550.00 cash. On April 20, 20xx, he transferred \$10,500 cash plus a \$50.00 wire fee to his relatives in Fiji.



Example CTR Scenario

Part I Person Involved in Transaction(s) 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 Common carrier

3 ☐ Multiple transactions

Check ☐ If entity

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

*5 First name ☐ Unknown

6 Middle name

Suffix

7 Gender

8 Alternate name

9 Occupation or type of business

9a NAICS Code

*10 Address ☐ Unknown

*11 City ☐ Unknown

*12 State ☐ Unknown *13 ZIP/Postal Code ☐ Unknown

*14 Country ☐ Unknown

*15 TIN ☐ Unknown 16 TIN type

*17 Date of birth ☐ Unknown

18 Contact phone number Ext.

19 E-mail address

*20 Form of identification used to verify identity ☐ Unknown ☐ Driver's license/State ID ☒ Passport ☐ Alien Registration ☐ Other

Number Country Issuing State

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

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



Example CTR Scenario

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 ☐ Shared branching

*25 CASH IN: (in U.S. dollar equivalent)

a Deposit(s)	\$ <input type="text" value=""/>	.00
b Payment(s)	<input type="text" value=""/>	.00
c Currency received for funds transfer(s) out	<input type="text" value="10,500.00"/>	
d Purchase of negotiable instrument (s)	<input type="text" value=""/>	.00
e Currency exchange(s)	<input type="text" value=""/>	.00
f Currency to prepaid access	<input type="text" value=""/>	.00
g Purchases of casinos chips, tokens and other gaming instruments	<input type="text" value=""/>	.00
h Currency wager(s) including money plays	<input type="text" value=""/>	.00
i Bills inserted into gaming devices	<input type="text" value=""/>	.00
z Other (specify):	<input type="text" value=""/>	
Fee	<input type="text" value="50.00"/>	
Total cash in	\$ <input type="text" value="10,550.00"/>	

*27 CASH OUT: (in U.S. dollar equivalent)

a Withdrawal(s)	\$ <input type="text" value=""/>	.00
b Advance(s) on credit (including markers)	<input type="text" value=""/>	.00
c Currency paid from funds transfer(s) in	<input type="text" value=""/>	.00
d Negotiable instrument(s) cashed	<input type="text" value=""/>	.00
e Currency exchange(s)	<input type="text" value=""/>	.00
f Currency from prepaid access	<input type="text" value=""/>	.00
g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments	<input type="text" value=""/>	.00
h Payment(s) on wager(s) (including race and OTB or sports pool)	<input type="text" value=""/>	.00
i Travel and complimentary expenses and book gaming incentives	<input type="text" value=""/>	.00
j Payment for tournament, contest or other promotions	<input type="text" value=""/>	.00
z Other (specify):	<input type="text" value=""/>	
Total cash out	\$ <input type="text" value=""/>	.00

26 Foreign cash in Foreign Country

28 Foreign cash out Foreign Country

Additional Example CTR Scenario



Sally Bland came in and bought Prepaid Access Cards at \$1,000 for each card for her 11 grandchildren. She brought in a total of \$11,000 cash to your teller on June 10, 20xx.



Example CTR Scenario

Part I Person Involved in Transaction(s) 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 Common carrier

3 ☐ Multiple transactions

Check ☐ If entity

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

*5 First name ☐ Unknown

6 Middle name

Suffix

7 Gender

8 Alternate name

9 Occupation or type of business

9a NAICS Code

*10 Address ☐ Unknown

*11 City ☐ Unknown

*12 State ☐ Unknown *13 ZIP/Postal Code ☐ Unknown

*14 Country ☐ Unknown

*15 TIN ☐ Unknown 16 TIN type

*17 Date of birth ☐ Unknown

18 Contact phone number Ext.

19 E-mail address

*20 Form of identification used to verify identity ☐ Unknown
☒ Driver's license/State ID ☐ Passport ☐ Alien Registration ☐ Other

Number Country Issuing State

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

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



Example CTR Scenario

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 ☐ Shared branching

*25 CASH IN: (in U.S. dollar equivalent)

a Deposit(s) \$.00

b Payment(s) .00

c Currency received for funds transfer(s) out .00

d Purchase of negotiable instrument (s) .00

e Currency exchange(s) .00

f Currency to prepaid access .00

g Purchases of casinos chips, tokens and other gaming instruments .00

h Currency wager(s) including money plays .00

i Bills inserted into gaming devices .00

z Other (specify): .00

Total cash in \$.00

*27 CASH OUT: (in U.S. dollar equivalent)

a Withdrawal(s) \$.00

b Advance(s) on credit (including markers) .00

c Currency paid from funds transfer(s) in .00

d Negotiable instrument(s) cashed .00

e Currency exchange(s) .00

f Currency from prepaid access .00

g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments .00

h Payment(s) on wager(s) (including race and OTB or sports pool) .00

i Travel and complimentary expenses and book gaming incentives .00

j Payment for tournament, contest or other promotions .00

z Other (specify): .00

Total cash out \$.00

26 Foreign cash in

Foreign Country



28 Foreign cash out

Foreign Country



Additional Example CTR Scenario



John Smith wants to cash 5 checks on April 15, 20XX.

Total of all checks is \$11,600.

1- \$50.00 drawn on Bank A

1- \$5,000 drawn on Bank B

1- \$6,000 an official check Bank C (Financial institution's GL not put on CTR)

1- \$50.00 drawn off of Bank C

1- \$500 drawn off Bank D



Example CTR Scenario

Part I Person Involved in Transaction(s) 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 Common carrier

3 ☒ Multiple transactions

Check ☐ If entity

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

*5 First name ☐ Unknown

6 Middle name

Suffix

7 Gender

8 Alternate name

9 Occupation or type of business

9a NAICS Code

*10 Address ☐ Unknown

*11 City ☐ Unknown

*12 State ☐ Unknown

*13 ZIP/Postal Code ☐ Unknown

*14 Country ☐ Unknown

*15 TIN ☐ Unknown

16 TIN type

*17 Date of birth ☐ Unknown

18 Contact phone number

Ext.

19 E-mail address

*20 Form of identification used to verify identity ☐ Unknown

☒ Driver's license/State ID ☐ Passport ☐ Alien Registration ☐ Other

Number Country Issuing State

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

Account number

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

Account number



Example CTR Scenario

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 ☐ Shared branching

*25 CASH IN: (in U.S. dollar equivalent)

a Deposit(s)	\$ <input type="text" value=""/>	.00
b Payment(s)	<input type="text" value=""/>	.00
c Currency received for funds transfer(s) out	<input type="text" value=""/>	.00
d Purchase of negotiable instrument (s)	<input type="text" value=""/>	.00
e Currency exchange(s)	<input type="text" value=""/>	.00
f Currency to prepaid access	<input type="text" value=""/>	.00
g Purchases of casinos chips, tokens and other gaming instruments	<input type="text" value=""/>	.00
h Currency wager(s) including money plays	<input type="text" value=""/>	.00
i Bills inserted into gaming devices	<input type="text" value=""/>	.00
z Other (specify):	<input type="text" value=""/>	.00

Total cash in \$.00

*27 CASH OUT: (in U.S. dollar equivalent)

a Withdrawal(s)	\$ <input type="text" value=""/>	.00
b Advance(s) on credit (including markers)	<input type="text" value=""/>	.00
c Currency paid from funds transfer(s) in	<input type="text" value=""/>	.00
d Negotiable instrument(s) cashed	<input type="text" value=""/>	11,600.00
e Currency exchange(s)	<input type="text" value=""/>	.00
f Currency from prepaid access	<input type="text" value=""/>	.00
g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments	<input type="text" value=""/>	.00
h Payment(s) on wager(s) (including race and OTB or sports pool)	<input type="text" value=""/>	.00
i Travel and complimentary expenses and book gaming incentives	<input type="text" value=""/>	.00
j Payment for tournament, contest or other promotions	<input type="text" value=""/>	.00
z Other (specify):	<input type="text" value=""/>	.00

Total cash out \$ 11,600.00

26 Foreign cash in

Foreign Country



28 Foreign cash out

Foreign Country



SARs What to Report



- Money Laundering:
 - Falsely presenting cash as if it was earned through a legitimate business. “Cleaning Cash”
- Cash Transaction Structuring:
 - Making multiple small transactions under the CTR financial reporting requirements to avoid reporting or tax authorities.
- Identity Theft or Fraud:
 - Make sure you have properly identified the individual through a Customer Identification Process.

SARs What to Report



SARs should be filed on suspicious activity exceeding the following prescribed limits:

- Suspicious activity aggregating \$5,000 or more when a suspect can be identified
- Suspicious activity aggregating \$5,000 or more that may involve potential money laundering or BSA violations
- Suspicious activity aggregating \$25,000 or more regardless of potential suspects
- Suspicious activity from insider activity for any amount (no minimum requirement)

Filing a SAR



- SARS must be filed within 30 days of the transaction date.
- Continuing Activity after a 90-day review has a filing deadline of 120 days after the date of the previously related SAR filing.
- Frequently asked questions on how to complete a SAR can be found at:
 - <https://www.fincen.gov/frequently-asked-questions-regarding-fincen-suspicious-activity-report-sar>

Confidentiality

Never tell a customer a Suspicious Activity Report (SAR) has been filed about them. You may only tell those entities who are legally entitled to know about the SAR. It's against the law to tell others.

SARs What to Report



- You have knowledge or suspect a transaction:
 - Involves funds derived from an illegal activity;
 - Is designated to evade Bank Secrecy Act requirements;
 - Serves no business or apparent lawful purpose;
 - Involves the use of an MSB to facilitate criminal activity.

SAR Narrative What to Include



- What was the conduct that raised suspicion?
- What was the actual date of determination that the activity was suspicious?
- Was the transaction attempted or completed?
- Who benefited from the transaction and why?
- What explanation did the customer give?

Describe the subject: such as, but not limited to, gender, race, tattoos, height, weight, age, clothing, jewelry, unusual mannerisms, video surveillance, time of day, vehicle (car, truck) and license plate number if possible.

What is a Money Service Business (MSB)



- According to the Internal Revenue Service (IRS) a MSB is:

“Generally, any person offering check cashing; foreign currency exchange services; or selling money orders, travelers’ checks or pre-paid access (formerly stored value) products; for an amount greater than \$1,000 per person, per day, in one or more transactions. A person who engages as a business in the transfer of funds is an MSB as a money transmitter, regardless of the amount of money transmission activity.”

To review the complete regulatory definition of an MSB visit:

<https://www.ecfr.gov/current/title-31/subtitle-B/chapter-X/part-1010/subpart-A/section-1010.100>

Effective Anti-Money Laundering (AML) Program



All MSBs are required to develop and implement an AML Compliance Program including the following items below.
The AML Program must be written and consider the inherent risks of the program



Designate a person to assure day-to-day compliance with the BSA



Incorporate policies, procedures and internal controls reasonably designed to assure compliance with the BSA



Provide education and training to appropriate personnel



Provide for an independent review to monitor and maintain an adequate program.

Additional CTR Filing Requirements for MSBs



As of March 11, 2025, FinCEN is requiring Money Services Businesses (MSBs) to file Currency Transaction Reports (CTRs) on all cash transactions exceeding the \$200 threshold, in a specific Geographic Targeting Order (GTO) for 30 ZIP codes across California and Texas, near the southwest border. The terms of the GTO are effective beginning 30 days after the date on which the order is published in the Federal Register. The terms are effective for 179 days thereafter.

Additional CTR Filing Requirements for MSBs



The order covers the following ZIP codes across seven counties in California and Texas:

- Imperial County, California: 92231, 92249, 92281, 92283
- San Diego County, California: 91910, 92101, 92113, 92117, 92126, 92154, 92173
- Cameron County, Texas: 78520, 78521
- El Paso County, Texas: 79901, 79902, 79903, 79905, 79907, 79935
- Hidalgo County, Texas: 78503, 78557, 78572, 78577, 78596
- Maverick County, Texas: 78852
- Webb County, Texas: 78040, 78041, 78043, 78045, 78046

FinCEN appreciates the assistance of MSBs in defending the United States from Mexico-based cartels, especially those trafficking fentanyl, and in otherwise protecting the U.S. financial system.

Any questions about the GTO should be directed to www.fincen.gov/contact.

Monetary Instrument Log



MSBs that sell Money Orders or Traveler's Checks must record cash purchases involving \$3,000 up to and including \$10,000. Multiple cash purchases of monetary instruments totaling \$3,000 or more must be treated as one purchase which must be recorded if they are made simultaneously or if the MSB knows that such purchases occurred during one business day.

Information to be recorded and maintained for five years:

- Name
- Date of Birth
- Address
- Government-issued photo ID
- Social Security Number or Tax Identification Number (if the buyer is a U.S. citizen)
- Type of Instrument purchased
- Transaction date, amount, and serial # for each Money Order or Traveler's Check

Money Transfer Services



A money transmitter is a person who provides money transmission services. The term 'money transmission services' means the acceptance of currency, funds, or other value that substitutes for currency from one location or person and the transmission of currency, funds, or other value that substitutes for currency to another location or person by any means.

How to record a money transfer of \$3,000 or more for senders and receivers:

- Sender's Name
- Date of Birth
- Address
- Government-issued photo ID or an alien identification card (record number)
- Social Security Number or Tax Identification Number (if the buyer is a U.S. citizen)
- Any payment instructions from the sender
- Any information about the recipient
- Transaction date, amount, and any identifying number(s)
- If the customer is conducting the transaction on behalf of another person(s), the information must be recorded for the said person(s).
- The information must be recorded and maintained for five years.

Check Cashers Records



- Daily cash reconciliation (log)
- Daily sales sheet
- Canceled money orders/traveler's checks
- Daily bank deposit slips
- Bank statements
- Transaction account detailing an individual's record of checks cashed, including copies of checks cashed

Prepaid Access Records



- Name
- Date of Birth
- Address
- Government-issued photo ID or an alien identification card (record number)
- Social Security Number or Tax Identification Number (if the buyer is a U.S. citizen)
- Transaction date, amount, and any identifying number(s) of purchase instruments
- If the customer is conducting the transaction on behalf of another person(s), the information must be recorded for all person(s).
- For more information, click the Prepaid Access link on the final page.

Non-Compliance Fines and Penalties



Pursuant to the BSA, AML penalties may be imposed against a financial institution, business, or any of its partners, directors, officers, or employees. Anti-money laundering penalties vary based on the type of breach or violation and the enforcement authority investigating the case:

- BSA-related AML criminal penalties include a fine of no more than \$250,000, imprisonment for no more than five years, or both. However, if the violation is part of a pattern of any illegal activity involving more than \$100,000 in a twelve-month period and involves the violation of another US criminal law, the fine can be up to \$500,000, imprisonment for up to ten years, or both.
- The maximum BSA-related civil penalties can vary significantly. For example, federal banking regulators have the authority to impose anti-money laundering penalties from \$5000 per violation to \$1,000,000, or 1% of the assets of a financial institution, whichever is greater, for every day that the violation occurs. These anti-money laundering penalties are primarily assessed for AML compliance program deficiencies, failures to file SARs, or in combination with other BSA violations.

Additional Information



Helplines:

- Title 31 Helpline: [866-270-0733](tel:866-270-0733) (toll-free inside the U.S.) or [313-234-6146](tel:313-234-6146) (not toll-free, for callers outside the U.S.)
- FinCEN Regulatory Helpline: [800-949-2732](tel:800-949-2732)
- BSA E-Filing Help Desk (technical assistance): [866-346-9478](tel:866-346-9478) (toll-free),
Email BSAEFilingHelp@fincen.gov

Additional Information



- BSA / AML InfoBase Examination Manual and Procedures

<https://bsaaml.ffiec.gov/>

- Bank Secrecy Act Filing Information

<https://www.fincen.gov/resources/filing-information>

- SAR Quick Reference Guide

https://www.fincen.gov/sites/default/files/guidance/msbsar_quickrefguide.pdf

All information provided in this presentation is based on rules and guidance from FinCEN and FFIEC. The presentation is solely for informational purposes and should not be considered as a form of legal advice.

THANK YOU



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PROGRESSIVE FEDERAL CREDIT UNION