



# GENERAL BULLETIN

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SENT TO:

2010 – 56

April 1, 2010

TO THE CHIEF EXECUTIVE OFFICER  
OR INDIVIDUAL ADDRESSED

CEO, CEO+, COO, CRO,  
Branch Admin., Compliance,  
Retail & Training Specialists

**RE: CBA Web Seminars – Three-Part Series: SAR & CTR**

Effective suspicious activity reporting requires a dependable flow of information from a variety of sources to the party that makes filing decisions. Decision makers focus on whether the activity is suspicious and whether a SAR filing is required or advisable. The process must be well documented, particularly in circumstances where a decision is made not to file.

## **PART I - TUESDAY, APRIL 27, 2010 – SAR DECISION MAKING & DOCUMENTATION**

This program focuses on how to build and document a SAR filing and decision making process. Sample procedures are provided.

- Training everyone to recognize and report suspicious activity
- Processing internal reports; e.g. to whom should they be sent and how much information should they obtain?
- How much time do we have to file? When does that time begin?
- Should filing decisions be made by an individual or committee? If we have a committee, who should be on it?
- What are the "filing triggers" for SARs?
- Board reporting, when and how much should be reported?
- Repetitive filings, should we file forever or close the account?
- Standards to unilaterally close an account

## **PART II – TUESDAY, MAY 11, 2010 – SAR FORM COMPLETION**

This web seminar focuses on completing the SAR, Form TD F 90-22.47. It describes how to complete the form and make it an effective vehicle for delivering information to law enforcement with emphasis on writing the SAR narrative and describing the supporting documentation.

- Finding the rest of the instructions for the current SAR
- Filing triggers from FinCEN and regulatory agency regulations
- Using case numbers
- Identifying suspects vs. victims
- Detailed descriptions for each of the 20 reasons for SAR filing
- When to check multiple reasons for SAR filing
- When to use "Other" as a reason for SAR filing

- Lottery scams, when to file
- SAR completion for "ongoing" suspicious activity
- Organizing the SAR narrative in chronological order
- Addressing "Who, what, when, where, why & how" in the narrative
- Facilitating law enforcement "data mining" operations in the narrative

### **PART III – TUESDAY, MAY 25, 2010 CTR FORM COMPLETION**

This is a fast paced session where an experienced BSA trainer explains Form 104, noting what information is required and how it could be useful to both bank and law enforcement.

- When a CTR is required
- Aggregation rules: Cash in vs. cash out, business day and by or on behalf of a person
- Deciding who benefits from a transaction
- Deposits to and withdrawals from joint accounts
- Cashing payroll checks - When do you file?
- Special filing suggestions for sole proprietors and other DBAs
- Identification requirements
- When should you refuse a transaction?
- Street or mailing address? Address for multi-location businesses?
- Business or occupation
- When there is no TIN
- When you don't know who made the transaction

### **AUDIENCE**

**SAR Decision Making & Documentation:** SAR committee members, officers and auditors. **SAR Forms:** Officers and auditors responsible for SAR review and completion. **CTR Forms:** Anyone responsible for completing or reviewing the CTR. **CE Applied:** 2.5 hours towards the CRCM/CFSSP/CBT/CPB/CCSR designations with the Institute of Certified Bankers, an affiliate of the American Bankers Association.

### **SPEAKER**

Ken Gollhofer, Pegasus Educational Services, LLC.

### **WHAT IS A WEB SEMINAR?**

A web seminar is an online seminar featuring live audio and PowerPoint slides. Everything is delivered through your PC. No special hardware is needed; however, speakers or headphones are required. The program consists of 90 minutes of instruction and 30 minutes live Q&A. Each registration provides one connection to the web seminar, materials and 30 days access to the online seminar. You may have unlimited listeners on your connection by speaker phone and PC. You will receive a confirmation with your PIN, materials and instructions. If you do not receive a confirmation within two days of the event call 888-262-7701.

**Free 30-Day Replay** - Within five working days after the broadcast, you will receive a URL providing unlimited access to a recorded copy of the presentation for 30 days. This enables you to participate in the live web seminar, train additional staff and review the material as needed.

The **On-Demand Web Seminar** is a live web seminar that has been recorded and then streamed to your computer to watch at your convenience. The program can be viewed anytime 24/7. You can watch a portion, come back and pick up where you left off! Anyone at your branch may access the program from a computer

using the login and password. When purchasing an On-Demand Web Seminar, you have unlimited access to the program for 6 months from the date of purchase.

Transmission, retransmission or republishing of the audio portion of the web seminar is prohibited. Your registration entitles you to one connection at one location with permission to make copies of materials for participants. Please complete one registration per location.

**REGISTRATION INFORMATION**

Registrations are requested to be submitted three days prior to the date of the web seminar. On-line registrations can be made at <http://www.bankersed.com/CTBANKERS/>. For all other registrations, please complete the attached registration form and send directly to Bankers Ed in advance of the program. Fee information for this program is listed on the registration form. **Payment is expected at the time of registration unless other arrangements are made prior to the event with the CBA.**

**Late Registration:** Registrations are accepted until the program starts. To ensure timely delivery of materials, etc., please register online when registering **two working days prior** to the broadcast (credit cards, e-checks and invoices accepted). If you would like assistance with online registration, contact 888-262-7701.

Please do not hesitate to contact either Kathy Parks or me if you have any questions about this web seminar.

Very truly yours,

LINDSEY R. PINKHAM  
Senior Vice President & Secretary

attachment

## **CBA WEB SEMINAR THREE PART SERIES -- SAR & CTR**

**Part I: Tuesday April 27, 2010**  
**Part II: Tuesday, May 11, 2010**  
**Part III: Tuesday, May 25, 2010**

**2:30 p.m. - 4:30 p.m. (EST)**  
**2:30 p.m. - 4:30 p.m. (EST)**  
**2:30 p.m. - 4:30 p.m. (EST)**

**REGISTER** (Each registration entitles you to one connection at one location where an unlimited number of listeners may participate):

Name \_\_\_\_\_ Title \_\_\_\_\_

Company \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_ E-mail \_\_\_\_\_

### **THREE WAYS TO REGISTER FOR CBA WEB SEMINARS:**

**Prior to April 19<sup>th</sup> (Part I), May 4<sup>th</sup> (Part II), and May 18<sup>th</sup> (Part III)**

**Mail:** Complete this form, include payment and mail it to: Bankers Ed: 5700 S. Mopac, #C310, Austin, TX 78749

**Anytime Prior to the Program**

**On-line:** Register on-line at: <http://www.bankersed.com/CTBANKERS/>.

**Phone:** Call 888-262-7701 with credit card information

### **CBA Web Seminar -- PART I: SAR DECISION MAKING & DOCUMENTATION**

**Tuesday, April 27, 2010 - (Seminar code: SW2-1149)**

Web Seminar/Materials (live hookup)       \$255 member       \$510 non-member

On-Demand Replay/Materials       \$275 member       \$550 non-member

### **CBA Web Seminar -- PART II: SAR FORM COMPLETION**

**Tuesday, May 11, 2010 - (Seminar code: SW2-1228)**

Web Seminar/Materials (live hookup)       \$255 member       \$510 non-member

On-Demand Replay/Materials       \$275 member       \$550 non-member

### **CBA Web Seminar -- PART III: CTR FORM COMPLETION**

**Tuesday, May 25, 2010 - (Seminar code: SW2-1153)**

Web Seminar/Materials (live hookup)       \$255 member       \$510 non-member

On-Demand Replay/Materials       \$275 member       \$550 non-member

### **METHOD OF PAYMENT (check one):**

**Check made payable to: Bankers Ed**

Discover Card

MasterCard

Visa

AMEX

Card Number \_\_\_\_\_

Exp. Date \_\_\_\_\_

Security Code (3 or 4 digits on back of card) \_\_\_\_\_

Signature \_\_\_\_\_

Amount \$ \_\_\_\_\_

For registration questions, please contact Bankers Ed customer support at 877-880-1335 or Kathy Parks at the Connecticut Bankers Association parks@ctbank.com or 860-677-5060.

**\*\*\*Registrations must be sent to Bankers Ed\*\*\***