



Banking Commission

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PREPARATION GUIDELINES FOR SUSPICIOUS ACTIVITY REPORT FORM (SAR) August 2001

This guidance is provided to assist financial institutions in preparing the Suspicious Activity Report (SAR), effective August 27, 2001.

General Guidelines

Dates - Whenever dates are requested, they should be entered using the format "mm/dd/yyyy," where "mm" is the month, "dd" is the day, and "yyyy" is the year. Zero (0) should precede any single digit number. If the month or day is not available or unknown, enter zeros in the space for "mm" and "dd." For example, 01/00/2000 indicates an unknown day in January 2000.

Numbers - Wherever information about monetary amounts is requested, the amounts should be entered using the format "\$0,000,000". (Round to the nearest dollar.) All amounts should be reported in US Dollars (USD). No notation of cents should be made.

Item 1 - Corrects Prior Report - If you are correcting a previously filed report, check the box at the top of the report (line 1). Complete the report in its entirety and include the corrected information in the applicable boxes. Then describe the changes that are being made in Part V, (Suspicious Activity Information Explanation/Description), line k.

PART I -- REPORTING FINANCIAL INSTITUTION INFORMATION

Item 2 - Name of Financial Institution - You should enter the full legal [Trade] name of the financial institution (FI).

Item 3 - EIN - Enter the FI's Employer Identification Number.

Item 4 - Address of Financial Institution - Enter the mailing address of the FI shown in Item 2.

Item 5 - Address of Branch Office(s) where activity occurred - If the location of the suspicious activity is different from that provided in Item 4, enter the address of the branch or office **where the activity occurred**. Otherwise, leave Item 9 blank. If the suspicious activity occurred at more than one branch, check the box indicating multiple branches, and include this information in Part V, Suspicious Activity Information Explanation/Description.

Item 6 - Account Number(s) affected - Enter the numbers of any account(s) that were affected by the suspicious activity. If more than four accounts are affected, provide the additional account numbers in Part V. If no account is affected, leave Item 14 blank. For each account listed indicate by checking the appropriate box whether the account is still open or has been closed.

PART II -- SUSPECT INFORMATION

If no information about the Suspect is available, check the box “Suspect Information Unavailable”. This will alert the law enforcement and regulatory users of the SAR database that this information has not been inadvertently omitted.

Items 7, 8 and 9 - Name of Individual or Entity - If the suspicious activity involves an individual, enter his or her last name in Item 7, first name in Item 8 and middle name or initial in Item 9. If there is no middle name or initial, leave Item 9 blank. If an organization is involved in the suspicious activity, enter its name in Item 7 and leave Items 8 and 9 blank. If the FI has knowledge of a separate “doing business as” name, enter the individual or organization’s name in Item 7 followed by the phrase “DBA” and the name of the business.

For example, John R. Smith DBA Smith Auto Sales or Johnson Enterprises DBA PJ’s Pizzeria. If additional space is needed to report the DBA, use Items 8 and 9. If more than one Part II is necessary, attach additional copies of page 1 to report the additional suspects. If both formal and alias names are established, enter the full legal name in Items 7, 8 and 9 and the alias name(s) in Part V.

Item 10 - Address - Enter the permanent street address to include any apartment or suite numbers of the person identified in Items 7, 8 and 9. If the individual or organization is from a foreign country, enter the foreign country address.

Item 11 – SSN, PN, DN or EIN - If an individual is shown in Items 7-9, enter his or her Social Security Number (SSN), Passport Number (PN), or Driver’s License Number (DN). If an organization is shown, enter its Employer Identification Number (EIN).

Item 12 - Country – Write out the full name of the country (other than RMI) that corresponds to the information in Items 11.

Item 13 - Telephone Number - Enter the home telephone number, including the area code for the individual entered in Items 7 - 9.

Item 14 - Telephone Number - Enter the business telephone number, including area code of the individual or organization entered in Items 7 - 9.

Item 15 - Occupation/Type of Business - Fully identify the occupation, profession or business of the person on whose behalf the transaction(s) was conducted. For example, secretary, shoe salesman, carpenter, attorney, housewife, restaurant owner, liquor store clerk, etc. Do not use non-specific terms such as merchant, self-employed, businessman, etc.

Item 16 - Date of Birth - If an individual is named in Items 7 - 9, enter his or her date of birth by using the method for entering dates described at the beginning of these Guidelines. [mm/dd/yyyy]

Item 17 - Admission/Confession - If the suspect made an admission or confession, check box a. If not, check box b.

Item 18 - Forms of Identification for Suspect - Check appropriate box for the form of identification provided by the suspect and use the lines provided to give specific data such as driver's license or passport number and issuing authority.

For box d, "other," provide a brief explanation in the space provided. If more space is required, enter the information in Part V.

Item 19 - Relationship to Financial Institution - Check each box that identifies the suspect relationship with the FI. More than one box may be checked. If the "other" box is checked, provide a brief explanation on the adjacent blank space. If more space is required, enter the information in Part V.

Item 20 - Is the relationship an insider relationship? – If the suspect is an insider relationship, check box a., otherwise, check box b. If the relationship is an insider relationship indicate if the suspect is still employed, suspended, terminated or has resigned by checking box c, d, e or f.

Item 21 - Date of Suspension, Termination, Resignation - Enter the date the suspect was suspended, terminated or resigned by using the method for entering dates described at the beginning of these Guidelines. [mm/dd/yyyy]

PART III -- SUSPICIOUS ACTIVITY INFORMATION

Item 22 - Date or date range of suspicious activity - Enter the first known date of suspicious activity and the last date of related suspicious activity. If only one date applies, include this date in the **From field** using the instructions at the beginning of these Guidelines. If multiple or related activity is conducted by the individual during the reporting period, the FI may report all activity on one SAR. Enter the date of the initial activity in the **From field** and the last occurrence date in the **To field**. (The first known date is a mandatory field.) [mm/dd/yyyy]

Item 23 - Dollar amount involved - Enter the dollar amount involved in the suspicious activity. If less than a full dollar is involved, round it to the next highest dollar.

An aggregated total of all transactions for multiple or related suspicious activities by the same individual or organization within the same reporting period may be shown in this field. The break-out of this total may then be listed in Part V.

Item 24 - Summary characterization of suspicious activity - Check all box(es) which identify the suspicious activity. More than one box may be checked. If “other” is checked, enter a brief explanation in the space provided. Do not use this space in lieu of a full description of the activity in Part V, Suspicious Activity Information Explanation/Description. (This is a mandatory field.)

Item 25 - Amount of loss prior to recovery - If the Financial Institution has lost funds or assets, enter the dollar value prior to any recovery.

Item 26 - Dollar amount of recovery - If funds or assets are recovered by the FI, enter the dollar value of the recovery. Use whole dollars only, rounding up to the next dollar.

Item 27 - Has the suspicious activity had a material impact on or otherwise affected the financial soundness of the institution? - Check box a or box b, as appropriate.

Items 28, 29, 30, 31, 32 – If the violation requires immediate attention contact appropriate law enforcement agencies. Check appropriate box(es) to indicate which law enforcement agencies have been advised by telephone, written communication or otherwise. List the name of the person(s) contacted, and telephone number(s) in Items 41-44. **CONTACT WITH LAW ENFORCEMENT AGENCIES DOES NOT ELIMINATE THE REQUIREMENT TO FILE THE SAR.**

PART IV – CONTACT FOR ASSISTANCE

Items 33, 34, and 35 - Contact Person’s Name - Enter the name of the person who can be contacted for additional information. It would be extremely helpful if the individual identified in this section has specific knowledge of the underlying facts.

Item 36 - Title/Occupation - Enter the contact person’s title or occupation.

Item 37 - Phone Number - Enter a phone number, including area code, where the contact person can be reached.

Item 38 – Date Prepared - Enter the date the SAR was prepared in the format described at the beginning of this Guidance. [mm/dd/yyyy]

Item 39 - Agency - If the SAR is not being filed by the financial institution, enter the name of the government agency or organization.

PART V -- SUSPICIOUS ACTIVITY INFORMATION EXPLANATION/DESCRIPTION

As stated in Part V of the SAR, this section of the report is **critical**. The care with which it is written may determine whether or not the described conduct and its possible criminal nature are clearly understood. Provide a complete chronological account of what is unusual, irregular or suspicious about the transaction. The narrative should include the material indicated in Part V but you should also include any other information that you believe is necessary to better enable investigators to understand the transaction you are reporting. If necessary, continue the narrative on a copy of this page of the SAR. **Remember that any supporting documentation such as spreadsheets, photocopies of canceled checks or other documents, surveillance photos, etc., must be retained at the financial institution.** Indicate in Part V what documentation is being retained.