

Appendix I
Examples of the Completion of the FinCEN Currency Transaction Report (“CTR”) for Transactions Involving Armored Car Services

1. Bank A – Single reportable transactions conducted by an armored car service on behalf of a bank or on behalf of a bank’s customer

On the same business day, Bank A receives currency deposits for the accounts of two accountholders, as follows:

- 1.1. Jack’s Restaurant is a large cash business that is a customer of Bank A. Bank A has contracted with Armored Car Service One (“ACS One”) to pick up the cash from Jack’s Restaurant and transport it to Bank A’s account with the Federal Reserve. ACS One picks up \$21,000 in cash from Jack’s Restaurant and delivers it to the Federal Reserve.

Bank A will complete the CTR reflecting this transaction as follows:

- Part I (1 of 1) will show Jack’s Restaurant’s corporate information, checking boxes 2c (“Person on whose behalf transaction was conducted”) and “Check if entity,” and inserting in item 21 the deposited amount (\$21,000) and Jack Restaurant’s account number.
- Part II will show the \$21,000 deposited in section 25a, checking box 24 (“Armored Car (FI Contract)”).
- Part III will contain Bank A’s information as the financial institution where transaction took place.

The completed CTR is shown on pages 6 through 9 of this guidance.

- 1.2. Bob’s Warehouse is a large cash business that is a customer of Bank A. Bob’s Warehouse has contracted with Armored Car Service One (“ACS One”) to pick up the cash from the warehouse and transport it to Bank A for deposit into Bob’s Warehouse account. ACS One picks up \$21,000 in cash from Bob’s Warehouse and delivers the cash to Bank A.

Bank A will complete the CTR reflecting this transaction as follows:

- Part I (1 of 2) will show Bob’s Warehouse corporate information, checking box 2c (“Person on whose behalf transaction was conducted”) and “Check if entity,” and inserting in item 21 the deposited amount (\$21,000) and Bob’s Warehouse account number.
- Part I (2 of 2) will show ACS One’s corporate information, checking boxes 2d (“Courier service (private)”) and “Check if entity,” and inserting in item 21 the amount delivered by ACS One on behalf of Bob’s Warehouse (\$21,000) and Bob’s Warehouse account number.
- Part II will show the \$21,000 deposited in section 25a.
- Part III will contain Bank A’s information as the financial institution where transaction took place.

The completed CTR is shown on pages 10 through 14 of this guidance.

Even though ACS One made a currency delivery of \$21,000 acting on behalf of a person other than Bank A, no separate CTRs need to be filed on ACS One’s delivery.



Currency Transaction Report

OMB No. 1506-0064

Version Number: 1.2

Filing Name

ACS Delivery O/B FI (1.1)

*1 Type of filing

Initial report

Correct/amend prior report

FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

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

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

Home

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

*23 Date of transaction 11/08/2012

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

*25 CASH IN: (in U.S. dollar equivalent)	*27 CASH OUT: (in U.S. dollar equivalent)
a Deposit(s) \$ <u>21,000.00</u>	a Withdrawal(s) \$ <u>.00</u>
b Payment(s) <u>.00</u>	b Advance(s) on credit (including markers) <u>.00</u>
c Currency received for funds transfer(s) out <u>.00</u>	c Currency paid from funds transfer(s) in <u>.00</u>
d Purchase of negotiable instrument (s) <u>.00</u>	d Negotiable instrument(s) cashed <u>.00</u>
e Currency exchange(s) <u>.00</u>	e Currency exchange(s) <u>.00</u>
f Currency to prepaid access <u>.00</u>	f Currency from prepaid access <u>.00</u>
g Purchases of casinos chips, tokens and other gaming instruments <u>.00</u>	g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments <u>.00</u>
h Currency wager(s) including money plays <u>.00</u>	h Payment(s) on wager(s) (including race and OTB or sports pool) <u>.00</u>
i Bills inserted into gaming devices <u>.00</u>	i Travel and complimentary expenses and book gaming incentives <u>.00</u>
z Other (specify): <u>.00</u>	j Payment for tournament, contest or other promotions <u>.00</u>
	z Other (specify): <u>.00</u>
Total Cash in \$ <u>21,000.00</u>	Total Cash out \$ <u>.00</u>

26 Foreign Cash in _____ Foreign Country + -

28 Foreign Cash out _____ Foreign Country + -

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

*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

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

*32 EIN

*33 Address

*34 City

*35 State

*36 ZIP Code

39 Financial institution ID type

ID number

*40 Contact office

*41 Phone number Ext.

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



Currency Transaction Report

OMB No. 1506-0064

Version Number: 1.2

Filing Name

ACS Del. O/B Customer (1.2)

*1 Type of filing

Initial report

Correct/amend prior report

FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

Part I Person Involved in Transaction 1 of 2



*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

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

Part I Person Involved in Transaction 2 of 2



*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 **Armored Car Service One**

*5 First name Unknown

6 Middle name

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business **Armored Car Service**

9a NAICS Code **4921**

*10 Address Unknown **55 West Street**

*11 City Unknown **Washington**

*12 State Unknown **DC**

*13 ZIP/Postal Code Unknown **20010**

*14 Country Unknown **US**

*15 TIN Unknown **654329874**

16 TIN type **EIN**

*17 Date of birth Unknown

18 Contact phone number **2025551212**

Ext.

19 E-mail address **compliance@acsone.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other **Business License**

Number **DC12456** Country **US** Issuing State **DC**

21 Cash in amount for individual or entity listed in Item 4 \$ **21,000**
Account number

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

Home

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

*23 Date of transaction 11/08/2012

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

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

a Deposit(s)	\$ <u>21,000.00</u>
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 \$ <u>21,000.00</u>	

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

a Withdrawal(s)	\$ <u>.00</u>
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 \$ <u>.00</u>	

26 Foreign Cash in _____

28 Foreign Cash out _____

Foreign Country

Foreign Country

+ -

+ -

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

*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

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

*32 EIN

*33 Address

*34 City

*35 State

*36 ZIP Code

39 Financial institution ID type

ID number

*40 Contact office

*41 Phone number Ext.

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

2. Bank B – Multiple transactions aggregating to a reportable amount

On the same banking day, Bank B receives currency deposits for the accounts of five accountholders, as follows:

2.1. Mr. Adams receives three deposits (for individual amounts in excess of \$10,000) for a total of \$37,500 in currency: \$11,000 is delivered by ACS One, an armored car service working on behalf of Bank B; \$15,000 is deposited by Mr. Adams himself; and the balance, \$11,500, is delivered by ACS Two, an armored car service acting on Mr. Adams's behalf.

2.1.1. *If Bank B is able to determine which armored car service transactions were conducted on behalf of the bank and which ones were conducted on behalf of the bank's customer,* Bank B will complete the CTR reflecting this transaction as follows:

- Part I (1 of 2) will show Mr. Adams's personal information checking boxes 2a ("Person conducting transaction on own behalf") and 3 ("Multiple Transactions"), and inserting in item 21 the total amount deposited (\$37,500), and Mr. Adams' account number.
- Part I (2 of 2) will show ACS Two's corporate information checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$11,500 delivered by ACS Two on Mr. Adams's behalf and Mr. Adams's account number.
- Part II will show the total deposits of \$37,500 in section 25a, checking box 24 ("Armored Car (FI Contract)" to justify the \$11,000 delivered by ACS One on Bank B's behalf.
- Part III will contain Bank B's information as the financial institution where transaction took place.

Parts I and II of the completed CTR are shown on pages 16 through 19 of this guidance.

2.1.2. *If Bank B is unable to determine which armored car service transactions were conducted on behalf of the bank and which ones were conducted on behalf of the bank's customer,* Bank B will complete the CTR reflecting this transaction as follows:

- Part I (1 of 3) will show Mr. Adams's personal information, checking boxes 2a ("Person conducting transaction on own behalf") and 3 ("Multiple Transactions"), and inserting in item 21 the total amount deposited (\$37,500) and Mr. Adams' account number.
- Part I (2 of 3) will show ACS Two's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$11,500 delivered by ACS Two and Mr. Adams's account number.
- Part I (3 of 3) will show ACS One's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$11,000 delivered by ACS One and Mr. Adams's account number.
- Part II will show the total deposits of \$37,500 in section 25a.
- Part III will contain Bank B's information as the financial institution where transaction took place.

Parts I and II of the completed CTR are shown on pages 20 through 24 of this guidance.



Currency Transaction Report

OMB No. 1506-0064

Version Number: 1.2

Filing Name

ACS Multi. Trans. (2.1.1)

*1 Type of filing

Initial report

Correct/amend prior report

FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

Part I Person Involved in Transaction 1 of 2



- *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 **Adams**

*5 First name Unknown **John**

6 Middle name **A**

Suffix

7 Gender **Male**

8 Alternate Name

9 Occupation or type of business **Tax Preparation Services**

9a NAICS Code **5412**

*10 Address Unknown **120 North Street**

*11 City Unknown **Baltimore**

*12 State Unknown **MD** *13 ZIP/Postal Code Unknown **21022**

*14 Country Unknown **US**

*15 TIN Unknown **987456552** 16 TIN type **SSN-ITIN**

*17 Date of birth Unknown **11/10/1960**

18 Contact phone number **4108952011** Ext.

19 E-mail address **adam@taxservices.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other

Number **745789152321** Country **US** Issuing State **MD**

21 Cash in amount for individual or entity listed in Item 4 \$ **37,500**

Account number **654321**

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

Account number

Part I Person Involved in Transaction 2 of 2



*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 **Armored Car Service Two**

*5 First name Unknown

6 Middle name

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business **Armored Car Service**

9a NAICS Code **4921**

*10 Address Unknown **55 Pratt Street**

*11 City Unknown **Baltimore**

*12 State Unknown **MD** *13 ZIP/Postal Code Unknown **21002**

*14 Country Unknown **US**

*15 TIN Unknown **885512366** 16 TIN type **EIN**

*17 Date of birth

18 Contact phone number **4105551212** Ext.

19 E-mail address **ACS2@ACS2.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other **Business License**

Number **MD456456456** Country **US** Issuing State **MD**

21 Cash in amount for individual or entity listed in Item 4 \$ 11,500
Account number **654321**

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

Home

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

*23 Date of transaction 12/19/2012

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

*25 CASH IN: (in U.S. dollar equivalent)	*27 CASH OUT: (in U.S. dollar equivalent)
a Deposit(s) \$ <u>37,500.00</u>	a Withdrawal(s) \$ <u>.00</u>
b Payment(s) <u>.00</u>	b Advance(s) on credit (including markers) <u>.00</u>
c Currency received for funds transfer(s) out <u>.00</u>	c Currency paid from funds transfer(s) in <u>.00</u>
d Purchase of negotiable instrument (s) <u>.00</u>	d Negotiable instrument(s) cashed <u>.00</u>
e Currency exchange(s) <u>.00</u>	e Currency exchange(s) <u>.00</u>
f Currency to prepaid access <u>.00</u>	f Currency from prepaid access <u>.00</u>
g Purchases of casinos chips, tokens and other gaming instruments <u>.00</u>	g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments <u>.00</u>
h Currency wager(s) including money plays <u>.00</u>	h Payment(s) on wager(s) (including race and OTB or sports pool) <u>.00</u>
i Bills inserted into gaming devices <u>.00</u>	i Travel and complimentary expenses and book gaming incentives <u>.00</u>
z Other (specify): <u>.00</u>	j Payment for tournament, contest or other promotions <u>.00</u>
	z Other (specify): <u>.00</u>
	<u>.00</u>
Total Cash in \$ <u>37,500.00</u>	Total Cash out \$ <u>.00</u>

26 Foreign Cash in _____

Foreign Country

+ -

28 Foreign Cash out _____

Foreign Country

+ -



Currency Transaction Report

OMB No. 1506-0064

Version Number: 1.2

Filing Name

ACS Multi. Trans. (2.1.2)

*1 Type of filing

Initial report

Correct/amend prior report

FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

Part I Person Involved in Transaction 1 of 3



*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 **Adams**

*5 First name Unknown **John**

6 Middle name **A**

Suffix

7 Gender **Male**

8 Alternate Name

9 Occupation or type of business **Tax Preparation Services**

9a NAICS Code **5412**

*10 Address Unknown **120 North Street**

*11 City Unknown **Baltimore**

*12 State Unknown **MD** *13 ZIP/Postal Code Unknown **21022**

*14 Country Unknown **US**

*15 TIN Unknown **987456552** 16 TIN type **SSN-ITIN**

*17 Date of birth Unknown **11/10/1960**

18 Contact phone number **4108952011** Ext.

19 E-mail address **adam@taxservices.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other

Number **745789152321** Country **US** Issuing State **MD**

21 Cash in amount for individual or entity listed in Item 4 \$ **37,500**
Account number **654321**

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

Part I Person Involved in Transaction 2 of 3



*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 **Armored Car Service Two**

*5 First name Unknown

6 Middle name

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business **Armored Car Service**

9a NAICS Code **4921**

*10 Address Unknown **55 Pratt Street**

*11 City Unknown **Baltimore**

*12 State Unknown **MD** *13 ZIP/Postal Code Unknown **21002**

*14 Country Unknown **US**

*15 TIN Unknown **885512366** 16 TIN type **EIN**

*17 Date of birth

18 Contact phone number **4105551212** Ext.

19 E-mail address **acs2@acs2.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other **Business License**

Number **MD458879622** Country **US** Issuing State **MD**

21 Cash in amount for individual or entity listed in Item 4 \$ **11,500**
Account number **654321**

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

Part I Person Involved in Transaction 3 of 3



*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 **Armored Car Service One**

*5 First name Unknown

6 Middle name

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business **Armored Car Service**

9a NAICS Code **4921**

*10 Address Unknown **100 Lombard Street**

*11 City Unknown **Baltimore**

*12 State Unknown **MD** *13 ZIP/Postal Code Unknown **21666**

*14 Country Unknown **US**

*15 TIN Unknown **368852111** 16 TIN type **EIN**

*17 Date of birth

18 Contact phone number **4106661212** Ext.

19 E-mail address **acs1@acs1.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other **Business License**

Number **MD3322554411** Country **US** Issuing State **MD**

21 Cash in amount for individual or entity listed in Item 4 \$ 11,000
Account number **654321**

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

Home

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

*23 Date of transaction 12/19/2012

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

*25 CASH IN: (in U.S. dollar equivalent)	*27 CASH OUT: (in U.S. dollar equivalent)
a Deposit(s) \$ <u>37,500.00</u>	a Withdrawal(s) \$ <u>.00</u>
b Payment(s) <u>.00</u>	b Advance(s) on credit (including markers) <u>.00</u>
c Currency received for funds transfer(s) out <u>.00</u>	c Currency paid from funds transfer(s) in <u>.00</u>
d Purchase of negotiable instrument (s) <u>.00</u>	d Negotiable instrument(s) cashed <u>.00</u>
e Currency exchange(s) <u>.00</u>	e Currency exchange(s) <u>.00</u>
f Currency to prepaid access <u>.00</u>	f Currency from prepaid access <u>.00</u>
g Purchases of casinos chips, tokens and other gaming instruments <u>.00</u>	g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments <u>.00</u>
h Currency wager(s) including money plays <u>.00</u>	h Payment(s) on wager(s) (including race and OTB or sports pool) <u>.00</u>
i Bills inserted into gaming devices <u>.00</u>	i Travel and complimentary expenses and book gaming incentives <u>.00</u>
z Other (specify): <u>.00</u>	j Payment for tournament, contest or other promotions <u>.00</u>
	z Other (specify): <u>.00</u>
Total Cash in \$ <u>37,500.00</u>	Total Cash out \$ <u>.00</u>

26 Foreign Cash in _____

Foreign Country

+ -

28 Foreign Cash out _____

Foreign Country

+ -

2.2. Mr. Brown receives a total of \$9,000 in currency delivered by ACS One acting on Mr. Brown's behalf. A CTR is not required as the total amount received does not exceed \$10,000.

2.3. Mr. Davis receives two deposits (individually in amounts exceeding \$10,000) for a total of \$23,000 in currency: \$10,500 is delivered by ACS Three acting on Mr. Davis's behalf; the balance, \$12,500, is delivered by a third party, John Smith.

Bank B will complete the CTR reflecting this transaction as follows:

- Part I (1 of 3) will show Mr. Davis's personal information, checking boxes 2c ("Person on whose behalf transaction was conducted") and 3 ("Multiple Transactions"), and inserting in item 21 the total amount deposited (\$23,000) and Mr. Davis's account number.
- Part I (2 of 3) will show ACS Three's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$10,500 delivered by ACS Three on Mr. Davis's behalf and Mr. Davis's account number.
- Part I (3 of 3) will show Mr. Smith's personal information, checking box 2b ("Person conducting transaction for another"), and inserting in item 21 the \$12,500 delivered by John Smith and Mr. Davis's account number.
- Part II will show the total deposits of \$23,000 in section 25a.
- Part III will contain Bank B's information as the financial institution where transaction took place.

Parts I and II of the completed CTR are shown on pages 26 through 30 of this guidance.

2.4. Mr. Edwards receives a total of \$8,600 in currency delivered by ACS Three acting on Mr. Edwards's behalf. A CTR is not required, as the total amount received does not exceed \$10,000.



Currency Transaction Report

OMB No. 1506-0064

Version Number: 1.2

Filing Name

ACS Multi. Trans. (2.3)

*1 Type of filing

Initial report

Correct/amend prior report

FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

Part I Person Involved in Transaction 1 of 3



*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 **Davis**

*5 First name Unknown **William**

6 Middle name **B**

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business **Real Estate Broker**

9a NAICS Code **5313**

*10 Address Unknown **100 Dorsey Hall Drive**

*11 City Unknown **Columbia**

*12 State Unknown **MD** *13 ZIP/Postal Code Unknown **21044**

*14 Country Unknown **US**

*15 TIN Unknown **258741000** 16 TIN type **SSN-ITIN**

*17 Date of birth Unknown **09/20/1965**

18 Contact phone number **4435551212** Ext.

19 E-mail address **william.davis@aol.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other

Number **258963215741** Country **US** Issuing State **MD**

21 Cash in amount for individual or entity listed in Item 4 \$ **23,000**
Account number **698523645**

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

Part I Person Involved in Transaction 2 of 3



*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 **Armored Car Service Three**

*5 First name Unknown

6 Middle name

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business **Armored Car Service**

9a NAICS Code **4921**

*10 Address Unknown **555 West Street**

*11 City Unknown **Columbia**

*12 State Unknown **MD** *13 ZIP/Postal Code Unknown **21044**

*14 Country Unknown **US**

*15 TIN Unknown **477523459** 16 TIN type **EIN**

*17 Date of birth Unknown

18 Contact phone number **4105551212** Ext.

19 E-mail address **acs3@acs3.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other **Business License**

Number **MD45876922** Country **US** Issuing State **MD**

21 Cash in amount for individual or entity listed in Item 4 \$ **10,500**
Account number **698523645** + -

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

Part I Person Involved in Transaction 3 of 3



*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

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

Home

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

*23 Date of transaction 12/19/2012

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

*25 CASH IN: (in U.S. dollar equivalent)	*27 CASH OUT: (in U.S. dollar equivalent)
a Deposit(s) \$ <u>23,000.00</u>	a Withdrawal(s) \$ <u>.00</u>
b Payment(s) <u>.00</u>	b Advance(s) on credit (including markers) <u>.00</u>
c Currency received for funds transfer(s) out <u>.00</u>	c Currency paid from funds transfer(s) in <u>.00</u>
d Purchase of negotiable instrument (s) <u>.00</u>	d Negotiable instrument(s) cashed <u>.00</u>
e Currency exchange(s) <u>.00</u>	e Currency exchange(s) <u>.00</u>
f Currency to prepaid access <u>.00</u>	f Currency from prepaid access <u>.00</u>
g Purchases of casinos chips, tokens and other gaming instruments <u>.00</u>	g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments <u>.00</u>
h Currency wager(s) including money plays <u>.00</u>	h Payment(s) on wager(s) (including race and OTB or sports pool) <u>.00</u>
i Bills inserted into gaming devices <u>.00</u>	i Travel and complimentary expenses and book gaming incentives <u>.00</u>
z Other (specify): <u>.00</u>	j Payment for tournament, contest or other promotions <u>.00</u>
	z Other (specify): <u>.00</u>
	<u>.00</u>
Total Cash in \$ <u>23,000.00</u>	Total Cash out \$ <u>.00</u>

26 Foreign Cash in _____

Foreign Country

+ -

28 Foreign Cash out _____

Foreign Country

+ -

2.5. Mr. Foster receives three deposits (individually in amounts below \$10,000) for a total of \$12,000 in currency; all deposits are delivered by armored car services acting on Mr. Foster's behalf: \$3,000 is delivered by ACS One, \$4,000 is delivered by ACS Two, and \$5,000 is delivered by ACS Three.

Bank B will complete the CTR reflecting this transaction as follows:

- Part I (1 of 1) will show Mr. Foster's personal information, checking boxes 2c ("Person on whose behalf transaction was conducted") and 3 ("Multiple Transactions"), and inserting in item 21 the total amount deposited (\$12,000) and Mr. Foster's account number.
- Part II will show the total deposits of \$12,000 in section 25a, checking box 24 ("Aggregated Transactions").
- Part III will contain Bank B's information as the financial institution where transaction took place.

Parts I and II of the completed CTR are shown on pages 32 through 34 of this guidance.

During the same business day, acting on behalf of Bank B's customers ACS One made total currency deliveries for \$12,000 (Case 2.2 \$9,000 and Case 2.5 \$3,000), ACS Two made total currency deliveries of \$15,500 (Case 2.1.1. \$11,500 and Case 2.5 \$4,000), and ACS Three made total currency deliveries of \$24,100 (Case 2.3 \$10,500, Case 2.4 \$8,600, and Case 2.5 \$5,000). However, Bank B's reporting obligation regarding transactions conducted by armored car services on behalf of its customers is satisfied by filing a CTR aggregated by customer. Bank B is not required to file additional, separate CTRs aggregating all armored car service deliveries/pick-ups conducted on behalf of its customers on the same business day.



Currency Transaction Report

OMB No. 1506-0064

Version Number: 1.2

Filing Name

ACS Aggregate Trans. (2.5)

*1 Type of filing

Initial report

Correct/amend prior report

FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

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 **Foster**

*5 First name Unknown **John**

6 Middle name **D**

Suffix

7 Gender **Male**

8 Alternate Name

9 Occupation or type of business

9a NAICS Code

*10 Address Unknown **246 West Street**

*11 City Unknown **Laurel**

*12 State Unknown **NE** *13 ZIP/Postal Code Unknown **79183**

*14 Country Unknown **US**

*15 TIN Unknown **663589974** 16 TIN type **SSN-ITIN**

*17 Date of birth Unknown **06/25/1970**

18 Contact phone number **2467891236** Ext.

19 E-mail address **john.foster@gmail.com**

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

Number **5569874563** Country **US** Issuing State **NE**

21 Cash in amount for individual or entity listed in Item 4 \$ **12,000**
Account number **98765321**

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

Home

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

*23 Date of transaction 12/19/2012

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

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

a Deposit(s)	\$	12,000.00
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		\$ 12,000.00

*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

+ -

3. Bank C - Armored car service delivering on behalf of a third party for the credit of the account of a bank's customer

3.1. Bank C receives a \$20,000 delivery from Armored Car Service Four (ACS Four), acting on instructions from a shipper, Mexican Casa de Cambio (Casa de Cambio Reynosa), to be credited to the account of Mr. Green, the bank's customer.

Bank C will complete the CTR reporting this transaction as follows:

- Part I (1 of 3) will show Mr. Green's personal information, checking box 2c ("Person on whose behalf transaction was conducted"), and inserting in item 21 the total amount deposited (\$20,000) and Mr. Green's account number.
- Part I (2 of 3) will show ACS Four's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$20,000 delivered by ACS Four on behalf of Casa de Cambio Reynosa and Mr. Green's account number.
- Part I (3 of 3) will show Casa de Cambio Reynosa's corporate information as an additional person on whose behalf the same \$20,000 was conducted, checking boxes 2c ("Person on whose behalf transaction was conducted") and "Check if entity," and inserting in item 21 the total amount deposited (\$20,000) and Mr. Green's account number.
- Part II will show the total deposits of \$20,000 in section 25a.
- Part III will contain Bank C's information as the financial institution where transaction took place.

The completed CTR is shown on pages 36 through 41 of this guidance.

Even though ACS Four made a currency delivery of \$20,000 acting on behalf of a person other than Bank C, no separate CTRs need to be filed on ACS Four's delivery.



Currency Transaction Report

OMB No. 1506-0064

Version Number: 1.2

Filing Name

ACS Del. O/B 3rd Pty (3.1)

*1 Type of filing

Initial report

Correct/amend prior report

FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

Part I Person Involved in Transaction 1 of 3



*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 **Green**

*5 First name Unknown **John**

6 Middle name **O**

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business

9a NAICS Code

*10 Address Unknown **400 North Forty**

*11 City Unknown **McAllen**

*12 State Unknown **TX**

*13 ZIP/Postal Code Unknown **79415**

*14 Country Unknown **US**

*15 TIN Unknown **668451236**

16 TIN type **SSN-ITIN**

*17 Date of birth Unknown **05/10/1960**

18 Contact phone number **2145551212**

Ext.

19 E-mail address **john.green@msn.com**

*20 Form of identification used to verify identity Unknown

Driver's license/State ID Passport Alien Registration Other



Number **TX66554422**

Country **US**

Issuing State **TX**

21 Cash in amount for individual or entity listed in Item 4 \$ **20,000**

Account number **22558899**



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

Account number



Part I Person Involved in Transaction 2 of 3



*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 **Armored Car Service Four**

*5 First name Unknown

6 Middle name

Suffix

7 Gender

8 Alternate Name

9 Occupation or type of business **Armored Car Service**

9a NAICS Code **4921**

*10 Address Unknown **120 West Street**

*11 City Unknown **McAllen**

*12 State Unknown **TX** *13 ZIP/Postal Code Unknown **79415**

*14 Country Unknown **US**

*15 TIN Unknown **477253639** 16 TIN type **EIN**

*17 Date of birth Unknown

18 Contact phone number **2145531212** Ext.

19 E-mail address **acs4@acs4.com**

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

Number **TX45879622** Country **US** Issuing State **TX**

21 Cash in amount for individual or entity listed in Item 4 \$ **20,000**
Account number **22558899**

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

Part I Person Involved in Transaction 3 of 3



- *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 **Casa de Cambio "Reynosa"**

*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 **555 Venustiano Carranza**

*11 City Unknown **Reynosa**

*12 State Unknown **TAM** *13 ZIP/Postal Code Unknown **8805**

*14 Country Unknown **MX**

*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 \$ **20,000**

Account number **22558899** + -

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

Account number + -

Home

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

*23 Date of transaction 12/19/2012

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

*25 CASH IN: (in U.S. dollar equivalent)	*27 CASH OUT: (in U.S. dollar equivalent)
a Deposit(s) \$ <u>20,000.00</u>	a Withdrawal(s) \$ <u>.00</u>
b Payment(s) <u>.00</u>	b Advance(s) on credit (including markers) <u>.00</u>
c Currency received for funds transfer(s) out <u>.00</u>	c Currency paid from funds transfer(s) in <u>.00</u>
d Purchase of negotiable instrument (s) <u>.00</u>	d Negotiable instrument(s) cashed <u>.00</u>
e Currency exchange(s) <u>.00</u>	e Currency exchange(s) <u>.00</u>
f Currency to prepaid access <u>.00</u>	f Currency from prepaid access <u>.00</u>
g Purchases of casinos chips, tokens and other gaming instruments <u>.00</u>	g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments <u>.00</u>
h Currency wager(s) including money plays <u>.00</u>	h Payment(s) on wager(s) (including race and OTB or sports pool) <u>.00</u>
i Bills inserted into gaming devices <u>.00</u>	i Travel and complimentary expenses and book gaming incentives <u>.00</u>
z Other (specify): <u>.00</u>	j Payment for tournament, contest or other promotions <u>.00</u>
	z Other (specify): <u>.00</u>
Total Cash in \$ <u>20,000.00</u>	Total Cash out \$ <u>.00</u>

26 Foreign Cash in _____

Foreign Country

+ -

28 Foreign Cash out _____

Foreign Country

+ -

WARNING: PRINTED VERSIONS OF THE BSA E-FILING FORMS ARE NOT FOR SUBMISSION AND WILL NOT BE PROCESSED BY FINCEN.

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

*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

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

*32 EIN

*33 Address

*34 City

*35 State

*36 ZIP Code

39 Financial institution ID type

ID number

*40 Contact office

*41 Phone number Ext.

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