

Dancing with the SARs

Your suspicious activity reports (SARs) are swimming in a sea of two billion [SARs filed with FinCEN](#) each year, so how do you get your investigations noticed? BSA analysts spend hours working on an investigation; thus you want to be sure to make the most significant impact for each suspicious activity case. At our recent BAM+ User Group conference, Terri Luttrell, CAMS-Audit discussed the best tactics to get your SAR noticed while ensuring that your regulators are happy. Here are seven tips to get eyes on your SAR:



Law enforcement is your primary SAR audience. While it is true that you are writing SARs for your auditors, regulators, and financial institution, your primary audience is law enforcement. They are the ones using the information in them to catch the bad actors and keep illicit funds out of your financial institution. The others are merely making sure they're being correctly filed.

Get the reader's attention early. Your first sentence must be captivating to keep the reader's attention. Tell your story in plain English and be careful with acronyms and financial institution jargon. Spell it out for the law enforcement personnel reading it. If your case is one of especially nefarious activity, pick up the phone and call law enforcement. Build that partnership and let them know what you've found.

Be concise, thorough, and accurate. Leave out any unnecessary information and reread the narrative before filing. Delete any extra "fluff" that will hide the important case information and lose your reader's interest. This is a detailed, factual document, not a creative writing essay.

Use keywords. Keywords not only make it easier for law enforcement to pull pertinent SARs, but it also satisfies FinCEN requests to add certain keywords in the narrative, such as "human trafficking," "funneling," "political corruption," etc.

Don't be repetitive. Tell your story and always include the who, what, when, where, how, and why you believe it is suspicious. If the information in a SAR box does not explain your story further, such as a subject's driver's license number, don't repeat it.

Use the most recent regulatory SAR guidance. To satisfy regulatory requirements, where conflicting guidance is concerned, use the most recent guidance from both FinCEN and the FFIEC.

FinCEN – use SAR form instructions and the 2012 SAR form Q & A ([FIN-2012-G002](#))

FFIEC – 2014 Exam Manual, [Appendix: L](#), SAR Quality Guidance

Always follow your regulator's instructions. While your regulator may want something in the SAR narrative that you believe will not assist law enforcement, pick your battles. A strong relationship and open communication with your regulator is healthy and critical for a strong BSA Program. Therefore, SAR narrative writing is probably not a battle you need to win.

SAR filing is one of the most important aspects of a BSA professional's job duties. If you follow these tips, law enforcement will more likely read your SARs and possibly open an investigation or use them in an active case. Your resources and knowledge are valuable, so make them count!